

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT ON LIABILITY

Alek Schott v. Bexar County, Texas
Case No. 5:23-cv-00706-OLG-RBF

EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ALEK SCHOTT,)
Plaintiff)
VS.) CIVIL ACTION NO.
5:23CV-00706-OLG-RBF
JOEL BABB, in his)
individual and official)
capacity; MARTIN A.)
MOLINA, III, in his)
individual and official)
capacity; JAVIER)
SALAZAR, in his)
individual and official)
capacity; and BEXAR)
COUNTY, TEXAS)
Defendants)

ORAL DEPOSITION OF PEDRO GAMBOA
AUGUST 1, 2024
VOLUME 2

ORAL DEPOSITION OF PEDRO GAMBOA, produced as a
witness at the instance of the Plaintiff and duly sworn,
was taken in the above styled and numbered cause on
Thursday, August 1, 2024, from 9:01 a.m. to 12:29 p.m.,
before Janalyn Elkins, CSR, in and for the State of
Texas, reported by computerized stenotype machine, at
the offices of Charles S. Frigerio, 111 Soledad, Suite
465, San Antonio, Texas, pursuant to the Federal Rules
of Civil Procedure and any provisions stated on the
record herein.

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1 THE REPORTER: Christie, you want a rough
2 draft, right?

3 MS. HEBERT: Yes, please.

4 THE REPORTER: Charles, do you want a copy?

5 MR. FRIGERIO: Yes.

6 THE REPORTER: And do you want a rough
7 draft?

8 MR. FRIGERIO: No.

9 THE REPORTER: Ryan, do you want a copy?

10 MR. ELLSWORTH: Yes, please.

11 THE REPORTER: And do you want a rough
12 draft?

13 MR. ELLSWORTH: I don't think so.

14 SERGEANT PEDRO GAMBOA,
15 having been duly sworn, testified as follows:

16 EXAMINATION

17 Q. (BY MS. HEBERT) Good morning, Sergeant Gamboa.
18 We're back here again. Thank you for being with us.
19 Again, I'm Christie Hebert. I represent the Plaintiff
20 Alek Schott in this case. You and I have previously met
21 twice before. The first at Captain Von Muldau's
22 deposition and then your own last week.

23 A. Correct, yes, ma'am.

24 Q. I know we've recently gone over the rules for
25 depositions. I'm not going to go through everything

1 again because I think you probably remember most of it,
2 so I'm going to hit the highlights. This is my
3 colleague Josh Windham. We're joined today by the
4 counsel for Defendant Bexar County and Defendant Molina,
5 Mr. Frigerio, Mr. Saenz, and Mr. Frigerio, then we're
6 also joined by counsel for Defendant Babb,
7 Mr. Ellsworth, and then we've got the court reporter,
8 Janalyn, today who is going to take down everything that
9 is said.

10 A. Yes, ma'am.

11 Q. We'll do kind of the usual stipulations,
12 waiving any defects with your deposition notice. You're
13 here today, and we're going to waive any objections to
14 the court reporter's qualifications. Janalyn's a
15 qualified court reporter to take down your deposition.

16 A. Yes, ma'am.

17 Q. Again, would you mind stating your full name
18 for the record?

19 A. Pedro Gamboa.

20 Q. And you understand you're under oath today?

21 A. I do.

22 Q. And it's the same oath as last time you
23 testified?

24 A. Yes, ma'am.

25 Q. And it's the same oath as if you were before a

1 judge in a courtroom?

2 A. Yes, ma'am.

3 Q. Okay. Again, it's important we have a clear
4 record, so that means not just nodding or saying uh-huh
5 or oh yeah. It's giving me clear answers and it's
6 important that I ask clear questions. So if you don't
7 understand my question, let me know. And, again, we'll
8 try to avoid interrupting each other. Is that okay?

9 A. Yes, ma'am.

10 Q. Okay. We're going to look at some documents
11 today. Again, it's your right to look at the entirety
12 of the document, and if you need more time, we can take
13 a break and let you fully review it. And we're also
14 going to look at some videos today. Again, that's your
15 right to review the entirety of a video. I'm going to
16 direct your attention to specific portions so we don't
17 spend hours watching videos. But if you want to watch
18 the whole thing, it is your right to do so during the
19 deposition or with counsel afterwards.

20 A. Yes, ma'am.

21 Q. Is there any reason that you can't give your
22 full and best testimony today?

23 A. No, ma'am.

24 Q. You're generally clear headed to testify?

25 A. I am.

1 Q. Cool. Preparation. Anything -- did you do
2 anything for this deposition other than speak to your
3 attorneys?

4 A. No, ma'am.

5 Q. Okay. Did you review any other additional
6 documents?

7 A. The only one that I sent was the criminal
8 interdiction announcement. I -- I forwarded that over
9 to Captain Von Muldau.

10 Q. Okay. When you say "announcement", can you
11 help me understand what that is?

12 A. It's the opening for criminal interdiction.

13 Q. The start of the unit or the position opening?

14 A. No, the position opening.

15 Q. Got it. So the job description?

16 A. Correct.

17 Q. Cool. Thank you.

18 A. Yes, ma'am.

19 Q. Did you review any other videos?

20 A. No.

21 Q. Okay. Any other --

22 A. Well, except -- what I normally.

23 Q. Okay. Tell me about that?

24 A. So I get -- I guess it's periodically, we get
25 12 videos that we have to review. Those are the ones I

1 reviewed.

2 Q. Okay. So you did your periodic body camera
3 footage review?

4 A. Correct.

5 Q. And is that for your current position?

6 A. Correct.

7 Q. Okay. And the videos that you reviewed weren't
8 necessarily as part of appearing for this deposition?

9 A. No.

10 Q. Okay. And the videos that you reviewed; I
11 assume that's in your role as a sergeant with the
12 organized crime division today?

13 A. Correct.

14 Q. Okay. And the videos that you reviewed, were
15 there traffic stops on them?

16 A. No, ma'am.

17 Q. Okay. No traffic stops.

18 Any other materials that you reviewed
19 between deposition -- last deposition and this
20 deposition?

21 A. No, ma'am.

22 Q. Okay. Other than your conversations with your
23 attorneys, which again, I'm not asking about that, did
24 you have any conversations with anybody else about your
25 last deposition or what this deposition was going to

1 entail?

2 A. No, ma'am.

3 Q. Okay. Like last time, we're going to talk a
4 lot about Bexar County Sheriff's Office. So when I say
5 sheriff's office, can we agree that I'm just referring
6 to the Bexar County Sheriff's Office?

7 A. Yes, ma'am.

8 Q. And, again, like last time, when I say
9 "sheriff", can we agree that I'm referring to the Bexar
10 County sheriff?

11 A. Yes, ma'am.

12 Q. And then can we agree that when we say "the
13 county", we're referring to Bexar County?

14 A. Yes, ma'am.

15 Q. Okay. I want to start by looking at some
16 documents.

17 A. Sure.

18 Q. So I know that this will be lots of fun. I'm
19 going to hand you a document that my colleague is going
20 to mark Exhibit 71. And I understand that you
21 previously provided a lot of information about the
22 criminal interdiction activities to your lieutenant for
23 the weekly report. Is that fair?

24 A. Correct.

25 Q. And we talked about several lieutenants during

1 your time at -- at the Bexar County Sheriff's Office.
2 What lieutenant did you provide information about the
3 criminal interdiction unit's weekly activities?

4 A. Lieutenant Ray Ortega.

5 Q. The only -- is that the only one?

6 A. At the time, yes, ma'am.

7 Q. Did you ever provide weekly report on criminal
8 interdiction activities to Lieutenant Freveletti?

9 A. No, I don't believe so.

10 Q. Okay. And did you ever provide weekly reports
11 on criminal interdiction activities to Lieutenant
12 Curtis?

13 A. No, ma'am.

14 Q. Okay.

15 (Exhibit No. 71 was marked.)

16 Q. (BY MS. HEBERT) So we're going to hand you a
17 very large document that we're going to mark 71. I have
18 a tabulated version, so this is my version over here.
19 And we're just going to kind of walk through it.

20 A. Okay.

21 MR. WINDHAM: Give me a moment to handle
22 this behemoth.

23 Q. (BY MS. HEBERT) Okay. I'll represent to you
24 that the county produced the documents here as emails
25 and attachments, and I put the emails in chronological

1 order with each attachment following the email that it
2 was attached to.

3 Would you mind just taking a second to
4 like, thumb through it and review what you're seeing
5 here and we'll talk about the document generally before
6 looking at different pages.

7 You don't have to review the whole thing
8 unless you want to. So just let me know -- we'll kind
9 of be going through the pages, I just want you to have a
10 general idea of what -- what we're looking at.

11 A. Yeah, it's all of them. Okay.

12 Q. Okay. So what are the documents attached to
13 these emails?

14 A. So looks to appear to me as the weekly activity
15 reports.

16 Q. For?

17 A. Special enforcement.

18 Q. Okay. And based on your understanding, did
19 Lieutenant Ortega create these weekly activity reports
20 from some information that you provided him?

21 A. I believe so, yes.

22 Q. Okay. And I see -- looking at page 1, the
23 subject is "Weekly Activity Report, Special Enforcement
24 Unit." Did you oversee the special enforcement unit?

25 A. I did.

1 Q. Okay. And then was just Lieutenant Ortega over
2 you?

3 A. Yes, ma'am.

4 Q. Okay. And it's my understanding that criminal
5 interdiction -- criminal interdiction activities were
6 part of this unit?

7 A. Correct.

8 Q. And then other than criminal interdiction
9 deputies, who was part of the special enforcement unit?

10 A. At the time, I had animal cruelty
11 investigations. I had the estray deputy.

12 Q. Tell me...

13 A. Loose livestock.

14 Q. Oh, loose livestock. Okay. The estray.

15 A. Yes.

16 Q. Got it. They were separate deputies?

17 A. Yes.

18 Q. Okay.

19 A. And then the mounted patrol, which was more of
20 a volunteer unit. The sheriff's executive protection.
21 The marine patrol unit. I believe that was all, I
22 think.

23 Q. Okay. So I just want to talk through the
24 numbers here. There was one independent animal cruelty
25 deputy?

1 A. Yes.

2 Q. And then one loose livestock deputy?

3 A. Correct.

4 Q. And then the mounted patrol folks, did they
5 pull from other units?

6 A. Yes.

7 Q. Was there any devoted mounted patrol deputy?

8 A. No.

9 Q. Any devoted executive protection deputy?

10 A. There was two others.

11 Q. Two devoted deputies?

12 A. Yes.

13 Q. Were they part of other units?

14 A. Yes. They had other duties.

15 Q. Oh, they had other duties, okay. So other than
16 whatever role they were -- these executive protection
17 deputies were doing as part of special enforcement, they
18 had other daily duties?

19 A. Correct.

20 Q. Okay. And those other daily duties, were they
21 part of special enforcement?

22 A. No.

23 Q. Okay. So you only -- these additional two
24 deputies that did executive protection, you only oversaw
25 them in their executive protection capacity?

1 A. Correct.

2 Q. Okay. And the marine patrol, was there a
3 devoted marine patrol deputy?

4 A. No, ma'am.

5 Q. Okay. That's helpful.

6 So we previously talked about how the
7 criminal interdiction unit was formed in the spring of
8 2019. Am I getting that right?

9 A. Yes, ma'am.

10 Q. Can you look at the date on page? And I see
11 Friday, August 6th, 2021; is that right?

12 A. Correct.

13 Q. So would there be weekly reports before
14 August 6th, 2021?

15 A. No, so -- I believe this is when they probably
16 started making these forms to be filled out.

17 Q. Okay. So before August 6th, 2021, how did you
18 report on the criminal interdiction unit or the special
19 enforcement unit?

20 A. Just talking to the lieutenant.

21 Q. Okay. You would just have a verbal
22 conversation?

23 A. Correct.

24 Q. Okay. All right. So we're going to walk
25 through some of these pages.

1 A. Okay.

2 Q. Let's go to page 8 -- page 3. And we'll just
3 kind of put a thumb in page 3. Page 3 is attached to
4 the email from page 1; is that correct?

5 A. I believe so, yes.

6 Q. All right. So the date of this report would
7 have been somewhere in August 2021?

8 A. Correct.

9 Q. And the date on page 2 indicates that it's
10 July 31 through August 6, and that would be 2021?

11 A. Correct.

12 Q. Okay. In looking at page 3, there -- the first
13 bullet on the top of page 3, it says, (Reading:)
14 Criminal Interdiction Unit took part with the Sheriff's
15 Conference and was involved in meeting with
16 approximately 15 sheriff's from different counties to
17 initiate a Criminal Interdiction Task Force.

18 Did I read that correctly?

19 A. Yes, ma'am.

20 Q. Can you tell me what this bullet is about?

21 A. So during the sheriff's conference here in
22 San Antonio, Sheriff Salazar had invited sheriffs
23 throughout Texas to join in in meeting and talking about
24 creating a criminal interdiction task force.

25 Q. Okay. So I -- I would like to just kind of

1 figure out exactly what that was about. So you're
2 telling me that Sheriff Salazar invited other sheriffs
3 from around Texas to come to Bexar County?

4 A. Correct. So -- so the conference at that time
5 was here in Bexar County in San Antonio.

6 Q. Understood.

7 A. So they're attending classes and guest
8 speakers, things of that nature. And then during, I
9 believe, it was either a breakout or after the
10 conference, he invited the sheriffs to -- to meet about
11 talking about the task force.

12 Q. Okay. So this is some kind of regular
13 conference that the sheriffs all get together?

14 A. Correct. Yes, ma'am.

15 Q. And at that collecting -- collection of
16 sheriffs meeting, Sheriff Salazar invited the sheriffs
17 to talk about forming a criminal interdiction task
18 force?

19 A. Correct.

20 Q. And were you at that meeting?

21 A. I was.

22 Q. Okay. Can you tell me what happened at that
23 meeting?

24 A. Well, they were just talking about how -- how
25 San Antonio is the hub for narcotics, illegal firearms,

1 money, couriers, things of that nature. And, you know,
2 it goes, you know, south -- south Texas, you know, they
3 travel up and down these highways, up north, north
4 Texas, you know, same thing, you know, they get the
5 traffic coming from out of state, things of that nature.

6 Q. Okay. So tell me how that relates to what the
7 sheriff was proposing with a criminal interdiction task
8 force?

9 A. Of forming a task force with the -- with the
10 central south regions of Texas to create this task
11 force.

12 Q. Okay. And what would the task force do?

13 A. Work the highways for anything criminal to
14 include active warrants, any kind of narcotics, any kind
15 of illegal weapons, money laundering, things of that
16 nature.

17 Q. Okay. So the idea behind the task force would
18 be to search for criminal activity along the highways?

19 A. It would be to stop or disrupt the criminal
20 activities traveling through Texas.

21 Q. Understood. And how did -- how did the task
22 force expect to achieve that?

23 A. So they -- what the plan was to mimic what
24 Dallas County or Collin County was doing, and what
25 Collin County was doing, they had seven counties that

1 were involved in the task force, north Texas. And --
2 and what they would do is they would work the highways
3 and they would disrupt this criminal activity.

4 Q. Okay. I guess I'm not clear on how this task
5 force and these counties would disrupt criminal
6 activity. Can you explain that to me?

7 A. By making the traffic stops, intercepting
8 anything illegal, anything criminal, warrants,
9 kidnappings, robberies, narcotics, illegal firearms,
10 things of that nature.

11 Q. Okay. So how -- how would the counties work
12 together to do that? It seems like --

13 A. So they would have an agreement --

14 Q. Okay.

15 A. -- between the counties.

16 Q. And what would the nature of that agreement
17 kind of be?

18 A. Probably that each county's officers were
19 allowed to work in other counties that were part of the
20 task force and be able to submit a case for prosecution
21 in those counties.

22 Q. Understood. So it's an agreement that allows
23 jurisdiction --

24 A. Correct.

25 Q. -- of different deputies to be expanded?

1 A. Yes, ma'am.

2 Q. And why -- why would the sheriffs want to do
3 that?

4 A. Well, because -- so it's -- it's hard to,
5 personnel-wise, to devote ten people to -- not that they
6 don't do it or that they can't do it, but it's hard for
7 other counties, smaller counties, to be able to devote
8 that amount of people to work this type of proactive
9 policing. So in coming together with surrounding
10 counties, then you would be able to have maybe a ten-man
11 team, one from this county, maybe two from this county.
12 So that way now you'd have a big enough group to be able
13 to work together to be effective.

14 Q. Okay. So help me understand why you need a big
15 group to be effective?

16 A. Because of all the highways that -- that are
17 passing through the different counties.

18 Q. And how would these -- this group of officers
19 on the task force, how would they work together?

20 A. So -- so depending on where they would be
21 working, that host county would kind of take the lead.
22 And then that way if we're working -- for example, if
23 we're working here in San Antonio and we're working 35,
24 then we'd have officers stretched out 35 to be able to
25 intercept this criminal activity.

1 Q. Okay. I guess that to me, how -- how does that
2 work for having officers stretched out to intercept the
3 criminal activity?

4 A. So that way you have coverage. So what happens
5 is a lot of these traffickers will send escorts to see
6 if there's any law enforcement on a particular roadway.
7 So they'll turn, go different routes to circumvent
8 having to go through that particular highway. So
9 there would stretch -- we will stretch out for here for
10 San Antonio would be, like, 281, Highway 16, Highway 90,
11 so we'd have four highways covered with officers that
12 these traffickers could potentially come through one of
13 those sections where they were being policed.

14 Q. Okay. I guess for me, how do you know when
15 someone turns off on a highway to go on a different
16 highway but they're not taking -- it's part of their
17 route or they're avoiding traffic, it's -- my Google
18 alert always tells me get on this other highway and go
19 this way, so how do you evaluate that?

20 A. So it's -- it's all, you know, open, you know.
21 It's not based on somebody this is the only route that I
22 take. It's just covering the roadways and these
23 traffickers are known to travel.

24 Q. Okay. Okay. I think I understand that. So
25 you kind of create a net?

1 A. Correct.

2 Q. Is that a fair description?

3 A. Something like that. Yes, ma'am.

4 Q. And did the criminal interdiction task force
5 have a way of identifying who they wanted to catch in
6 that net? By that I mean, like, what was the criteria?

7 A. Proactive policing.

8 Q. Okay.

9 A. Anybody violating the law. I mean, through
10 traffic stops, through speeding, through failure to
11 maintain single lanes, through defective equipment,
12 that -- that type of enforcement.

13 Q. Okay. So any traffic violation was fair
14 game --

15 A. Correct.

16 Q. -- to start an investigation?

17 A. Yes, ma'am.

18 Q. All right. Let's go to another page. And
19 Sergeant Gamboa, I apologize, if you need a break from
20 this document, we can take a break.

21 A. Sure.

22 Q. Let's go to page 8. Now on page 8, I want to
23 just look at the top, "Total Authorized", and I think
24 that means personnel. I see seven. Can you tell me who
25 those seven folks were?

1 A. So it would be the four criminal interdiction.
2 Then it would be the animal cruelty investigator, the
3 estrays deputy -- and I'm trying to think who I'm
4 missing, oh, myself.

5 Q. Okay. So that would be the seven folks?

6 A. Correct.

7 Q. Okay. I want to look down to the -- okay, this
8 is a good question. At this time in 2021, the criminal
9 interdiction unit had two deputies or more?

10 A. I believe there was two at the time.

11 Q. Okay. So who were the -- who were the other
12 two? So by my math, you've got one animal cruelty
13 deputy, one estrays deputy, yourself, two criminal
14 interdiction, that's five. So I'm missing one -- I'm
15 missing two?

16 A. So the two were on administrative duty.

17 Q. Okay. And this was John Aguillon?

18 A. Aguillon.

19 Q. Aguillon, and?

20 A. Dustin Treadwell.

21 Q. Dustin Treadwell.

22 So I see that admin leave is three under
23 total payout. Why -- who's the third one then?

24 A. I don't remember who.

25 Q. Okay. All right. So I want to skip down to

1 the "Accomplishments" section.

2 A. Okay.

3 Q. And the second bullet, can I read that to you?

4 A. Sure.

5 Q. Says, (Reading:) Interdiction had more than 20
6 arrests as a 2--man team concentrating on the Highways
7 and Interstate. They have seized \$14,569 in Money and
8 vehicles for the Month of August.

9 Did I read that correctly?

10 A. Yes, ma'am.

11 Q. Okay. So just a couple of questions about
12 that. 20 arrests. Is that typical?

13 A. It could be. It's a proactive unit, so, I
14 mean, possible.

15 Q. Okay. And based on your experience, about how
16 many stops would that have been?

17 A. I mean, it could -- it could be a car full of
18 criminals. So, I mean, there's no really -- no telling
19 on the number of stops.

20 Q. Sure. And the \$14,569, is that a typical
21 amount of money seized from a week in criminal
22 interdiction activities?

23 A. So just reading this, I believe that may be of
24 combination of maybe money that was seized and vehicles
25 that were either recovered or seized for those criminal

1 activity.

2 Q. Okay. So that was an estimated value --

3 A. Correct.

4 Q. -- of money and vehicles seized?

5 A. Correct.

6 Q. Okay. That makes me -- I'm going to ask
7 another question and I'm going to pull from an exhibit
8 that's not here, Josh. So I'm going to use this one.

9 MR. WINDHAM: It's not on here.

10 MS. HEBERT: Can you mark this 72?

11 (Exhibit No. 72 was marked.)

12 Q. (BY MS. HEBERT) And I'm going to represent to
13 you that these are orders -- a document that we received
14 from the county attached to an email about criminal --
15 or commissioner's court meeting.

16 A. Okay.

17 Q. I think it was labeled as draft minutes or
18 minutes. And I want to flip to page 11. I think it's
19 page 11. And if you wouldn't mind looking at Item 34
20 on page 11 when you get a chance.

21 A. Okay.

22 Q. And I'm just going to read that to you.

23 (Reading:) The Court hereby ordered and approved a
24 motion approving the Sheriff's request to place a seized
25 2021 Ford F-150 sedan VN No. 1FTEW1EP1MFC29029 into

1 service in the Organized Crime Division. (Record).

2 Did I read that correctly?

3 A. Yes, ma'am.

4 Q. Okay. Can you tell me what's going on here?

5 It seems to me that a vehicle that the organized crime
6 division seized was then put into service to be used by
7 the organized crime division. Is that a fair assessment
8 of what's happening here?

9 A. Yes, ma'am.

10 Q. Okay.

11 MS. HEBERT: So we can close this document
12 and put it to the side, Exhibit 72.

13 Q. (BY MS. HEBERT) So looking back at Exhibit 71
14 on page 8, is this kind of what the seizure of a vehicle
15 that this exhibit was talking about, some kind of
16 vehicle that was seized perhaps in a traffic stop?

17 A. Could have been, yes, ma'am.

18 Q. Okay. Let's flip to page 9 and if you wouldn't
19 mind going to the section on "for follow up."

20 MR. WINDHAM: What exhibit are we on, for
21 the record?

22 MS. HEBERT: 71.

23 Q. (BY MS. HEBERT) And I'm going to read this one
24 to you, too. (Reading:) I received dates from Sheriff
25 Skinner out of Collin County SO. He is available to

1 come down September 14th, 15th, or 16th. I will be
2 sending an email to the sheriffs from the conference
3 meeting about his availability.

4 Explain to me what this bullet is about?

5 A. So Sheriff Skinner is a sheriff in Collin
6 County. And they are -- they have a task force that the
7 sheriff wanted to try to have -- make a task force here
8 that would match what they're doing in north Texas.

9 Q. Okay. And is this that regional several county
10 task force we previously talked about?

11 A. Correct. Yes, ma'am.

12 Q. Okay. And did you ever visit Sheriff Skinner
13 in the Collin County task force?

14 A. I did.

15 Q. And when did you visit them?

16 A. It was probably at the beginning of creating
17 the criminal interdiction pilot program.

18 Q. Okay. So that was sometime in 2019?

19 A. Maybe, yeah, around that time maybe.

20 Q. That's fine. And what did that visit look
21 like?

22 A. We just went to see what their -- you know,
23 everyday operation was and how they would be working
24 interdiction.

25 Q. Okay. Does that mean you did ridealongs with

1 them?

2 A. We -- I believe we did maybe a couple hours.
3 But it was mostly just me sitting meeting in their
4 office talking about what they do.

5 Q. Okay. And what did you learn from that
6 experience?

7 A. So just the -- the MOU that they had with the
8 different counties on how things would work out with
9 them.

10 Q. Okay. How to navigate?

11 A. Correct.

12 Q. A collaboration amongst counties?

13 A. Yes, ma'am.

14 Q. And doing the ridealongs, what did you learn
15 through that experience?

16 A. Just, you know, they showed us the different
17 highways in north Texas that -- that they've seen a lot
18 of the traffic coming from either California or from the
19 east, New Orleans and how the different traffic, you
20 know, comes in through their counties and it either come
21 down south Texas or they travel west to California or
22 east to New Orleans.

23 Q. Okay. So you drove around looking at highways?

24 A. Yeah.

25 Q. Was that it?

1 A. That was pretty much it.

2 Q. Did you do any traffic stops with them?

3 A. No. No.

4 Q. Okay. This meeting when Sheriff Skinner was
5 supposed to come down to visit, who was going to attend
6 this meeting?

7 A. So the sheriffs that attended the first meeting
8 at the conference were the only contacts that I had. So
9 the invite was going to go out to them.

10 Q. Okay. Can we look down to the last two bullets
11 on this page. The first one says, (Reading:) Waiting
12 on Transfer papers for Goliath (Bobcat), Dexter (Tiger).

13 What's that about?

14 A. So the animal cruel investigation side of it of
15 special enforcement, we had seized both of these cats
16 from a residence here in Bexar County.

17 Q. And you wanted to take them home?

18 A. No, we were -- we were seizing them and placing
19 them in one of our rescues.

20 Q. Understood. And then the last bullet,
21 (Reading:) Waiting on Transfer papers for the lemur?

22 A. So same thing. We had seized a lemur and were
23 waiting on the transfer papers so that way we can
24 actually give possession to one of our rescues here.

25 Q. Oh, so it was an actual lemur?

1 A. Yes, ma'am.

2 Q. Cool. All right. So I'm going to flip to
3 another page. If you mind going to page 15. We'll flip
4 back a little bit just to check the email to see the
5 date here. This report was attached to the August 30th,
6 2021 email.

7 A. Okay.

8 Q. Does that seem right?

9 A. Yes, ma'am.

10 Q. I see a bullet, the second bullet under "New
11 Business." (Reading:) Motor Vehicle Criminal
12 Interdiction Conference next week Aug 30 - September 2
13 interdiction will be attending.

14 What is this conference?

15 A. I believe it was a Motor Vehicle Criminal
16 Interdiction Conference.

17 Q. And did you attend this conference?

18 A. I'm sure I did. I can't remember.

19 Q. Okay. Interdiction will be attending. Did
20 that mean the entire unit attended this conference?

21 A. I'm sure, yes.

22 Q. And at the time of August 2021, that would have
23 been Deputy Gereb, Deputy Babb, and yourself?

24 A. Correct.

25 Q. I think, hold on, let me see if we have another

1 exhibit.

2 MR. HEBERT: Will you pull out CC and R
3 exhibits, Mr. Windham. I have a lot of paper today, so
4 bear with us.

5 THE WITNESS: No problem.

6 (Exhibit No. 73 was marked.)

7 MS. HEBERT: Mr. Windham, what number is
8 this exhibit?

9 MR. WINDHAM: 73.

10 Q. (BY MS. HEBERT) Okay. My colleague handled --
11 handed you what has been marked Exhibit 73. Is this the
12 Motor Vehicle Criminal Interdiction Conference that took
13 place from August 30th, 2021 to September 2nd?

14 A. I believe so, yes, ma'am.

15 Q. And this looks like the agenda to me?

16 A. Yes, ma'am.

17 Q. Is this refreshing your memory, did you attend
18 this conference?

19 A. I'm sure I did perhaps. I don't recall. I
20 mean, it's been a while.

21 Q. It looks like it was here in San Antonio?

22 A. Yes.

23 Q. Can we maybe talk about some of it and see if
24 you remember any of the content?

25 A. Sure. Sure.

1 Q. It seems like the first day, Sunday,
2 August 29th, you probably wouldn't have attended that
3 much. We can skip that one. Monday, August 30th, I see
4 a -- after the morning break a course on target
5 selection by Shawn Pardazi?

6 A. Pardazi.

7 Q. Thanks. Do you -- do you know what this course
8 would have covered?

9 A. I'm sure it would probably cover moving
10 vehicles on the highways.

11 Q. So explain -- explain to me what you mean by
12 that?

13 A. Like, noticing driving patterns of evading. If
14 you're on the -- in the center median, you'll see a
15 vehicle abruptly get off that lane, that nearest lane
16 towards you, forget to use a turn signal, either swerve
17 in and out from that lane and just recognizing the
18 traffic violation.

19 Q. Okay. So it sounds like there was a lot in
20 there. Was this course on identifying traffic
21 violations, like, hey, this is what...

22 A. So that specific target selection from 9:30 to
23 11:30 so the whole conference wouldn't be about that.
24 It was just this section would cover that.

25 Q. Okay. And did this class review the Texas

1 Criminal Code or the Texas Traffic Code, then?

2 A. It may have. I'm not sure. I can't remember.

3 Q. Okay. And it seemed like you talked -- you
4 talked a little bit about behavioral driving. What is
5 behavioral driving?

6 A. Just patterns that drivers do, right. So
7 everybody drives a certain way. And they react
8 different to maybe recognizing that there's a law
9 enforcement officer right next to you and you avoid eye
10 contact because, you know, possibly you've got -- maybe
11 you're driving faster than the speed limit. Speed limit
12 is 70, you're driving 71, 72 miles an hour. Just like
13 I'm going -- they're going to stop me because I'm going
14 to two miles over the speed limit.

15 That creates a reaction. It may cause a
16 traffic violation because they're concentrating on
17 something else other than driving normally.

18 Q. Okay. So what I --

19 A. That was just an example.

20 Q. Okay. Yeah, sure. So what I hear you saying
21 is you're looking for certain behaviors that happen in
22 response to seeing law enforcement?

23 A. Correct.

24 Q. Okay. And this course by Shawn Pardazi would
25 have likely covered that?

1 A. Correct.

2 Q. Can we flip to the next page, so second page of
3 this document, Exhibit 73.

4 A. Yes, ma'am.

5 Q. There's another course from 1300 hours to 1455,
6 "Evading Honesty", and it looks like it's also by that
7 Shawn Pardazi?

8 A. Pardazi.

9 Q. Uh-huh. What would this "Evading Honesty"
10 class be about?

11 A. So just maybe asking questions during the field
12 site interview that either they're evasive in answering
13 because they don't want to be tied to something, tied to
14 their story. So they -- instead of answering the
15 question, they'll evade telling the truth.

16 Q. Okay. So would it be fair to say that this
17 course was about detecting deception?

18 A. Yes.

19 Q. And you mentioned questions during the field
20 site interview. Can you explain that to me?

21 A. Just the officer asking questions where they're
22 coming from, where they're going, who they're meeting,
23 things of that nature.

24 Q. Okay. So would it be fair to say for every
25 traffic stop, every criminal interdiction stop, you

1 would be asking certain questions to assess the driver's
2 answers?

3 A. Yes. If they -- when they initially make
4 contact with them, that could happen that fast.

5 Q. Okay. Explain that to me, "could happen that
6 fast"?

7 A. So if they say, for example, that they are
8 traveling down south and they're going to be there
9 for -- on vacation for a week. And --

10 Q. And they means the driver?

11 A. Right. And he's asked if they -- you know,
12 maybe they live down south somewhere. They said no,
13 this is their first time ever being there, and there's
14 no luggage or anything that's going to confirm that
15 they're on -- that they're going to go on vacation to
16 any normal person. Then that would be kind of the
17 deception side of it that they would continue asking
18 questions about.

19 Q. Okay. Would this "Evading Honesty" course
20 include looking at people's physical reactions?

21 A. Could have, yes, ma'am.

22 Q. And it looks like there was another "Evading
23 Honesty" class from 1500 hours and ten minutes to 1650.
24 Is that fair?

25 A. Yes, ma'am.

1 Q. And so in total, I'm not sure how much time
2 that looks like. But there were two courses on evading
3 honesty during this conference?

4 A. Yes, ma'am.

5 Q. Okay.

6 A. I'm sure it's probably the same course, just
7 they split it.

8 Q. They took a break?

9 A. Yes.

10 Q. Okay. And -- and is the main thrust of this
11 "Evading Honesty" course that you interview drivers?

12 A. Correct.

13 Q. Okay. Can we look at the next course that you
14 see a name by?

15 A. Okay.

16 Q. And the date for that would be August 31st. I
17 see 8:15 to 9:45 "Rapid Accessing the Passenger Car" by
18 Mike Tamez?

19 A. Tamez. Uh-huh.

20 Q. 720?

21 A. Yes, ma'am.

22 Q. Can you tell me what this course would be
23 about?

24 A. Just because of the title, I would say that any
25 kind of vehicle used to carry passengers.

1 Q. Okay. So it doesn't seem like this course
2 would be about identifying vehicles that carry
3 passengers. Rapid accessing to me sounds like getting
4 quick access to a passenger car. Is that fair?

5 A. Yeah.

6 Q. So would this course have been -- was this
7 course about techniques to get rapid access to a
8 passenger car?

9 A. So I believe that the rapid accessing would
10 probably cover, like, trains, buses, commercial buses,
11 things of that nature.

12 Q. Okay. I don't understand how those would be
13 passenger cars. To me, passenger cars seems like, you
14 know, your sedan, your Honda Civics, your -- I don't
15 know any other cars. Your Toyotas?

16 A. Any car could be a passenger car.

17 Q. Okay.

18 A. But I believe what this would be covering
19 would -- would be your authority to enter a bus, train.

20 Q. Okay.

21 A. Things of that nature.

22 Q. Sure. And then the 1500 hour 10 minutes class,
23 "CMV's and Smuggling" by Ray Herndon, Diamond Back?

24 A. Yes, ma'am.

25 Q. Does CMV stand for commercial motor vehicle?

1 A. Yes, ma'am.

2 Q. So this would have been a course about
3 commercial motor vehicles and smuggling and how that
4 works?

5 A. Correct.

6 Q. And what is a commercial motor vehicle?

7 A. Anything that you would need a commercial
8 driver's license to operate.

9 Q. So like a tractor-trailer?

10 A. Correct.

11 Q. Okay. Same course the next day. We can skip
12 that then. Again, that course is again at 1300 hours on
13 September 1st. I want to look at the "15 Tactics to
14 Greater Success" by Dennis Benigno, Street Cop. What
15 was this course about?

16 A. I would imagine that it was your training
17 tactics to make sure that you're safe during a traffic
18 stop.

19 Q. Okay. Can you tell me more about that?

20 A. Just positioning yourself, how you approach a
21 car, what to look for if someone all of a sudden is
22 making a furtive movement under their seat, you know, to
23 protect yourself.

24 Q. Okay. Well, this doesn't seem like 15 tactics
25 to greater safety. It seems like 15 tactics to greater

1 success. So what would success look like to these
2 traffic stops?

3 A. You make it home.

4 Q. You make it home, okay.

5 Okay. Thursday, September 2, there is a
6 "Vehicle Selection" course by Kenny Williams, Street
7 Cop.

8 A. Okay.

9 Q. What is that course likely about?

10 A. I would imagine -- I mean, it probably would be
11 around the same thing of looking at vehicles as they're
12 approaching you or driving away from you and noticing
13 something that would stick out that would not be normal.

14 Q. Okay. And then the last course, "Common Hidden
15 Compartments" by Brad Gilmore from Street Cop. What was
16 this course about?

17 A. Different hidden compartments in the vehicles
18 and trailers and things like that.

19 Q. So basically how to identify those
20 compartments?

21 A. Well, probably not how to identify them. But
22 recognize the areas that are commonly used as hidden
23 compartments.

24 Q. Okay. Got it.

25 And would you and the criminal interdiction

1 deputies who attended this conference -- let me ask --
2 let me rephrase that.

3 Did you and the criminal interdiction
4 deputies who attended this conference apply these
5 lessons, this training, to criminal interdiction
6 activities that you guys did after the training?

7 A. It's a -- it's a tool to use.

8 Q. Sure.

9 A. Was it used? Could have been. You know, if
10 you recognize something that you just learned, you can,
11 you know, explore that.

12 Q. Okay. And I -- I understand that you didn't do
13 traffic stops. But the two deputies who did do traffic
14 stops with the criminal interdiction unit, they could
15 choose to use these tactics or not. Is that fair?

16 A. Yes, ma'am. Yes, ma'am.

17 Q. And if your deputies used any of the tactics
18 that were part of the instruction or from the
19 instruction of this conference, you would have approved
20 those tactics?

21 A. Yes, ma'am.

22 Q. Okay. Let's look at another page. We're going
23 to put this agenda away.

24 A. Okay.

25 Q. We're going to go back to Exhibit 71. And

1 let's skip to page 20. And just looking at the prior
2 page, page 19, this report would have been attached to
3 the Friday, September 10th, 2021 email?

4 A. Correct, yes, ma'am.

5 Q. And so this was the weekly activity report from
6 9/4 to 9/10, 2021?

7 A. Yes, ma'am.

8 Q. Can we look the "Critical Issues Section" at
9 the last bullet, (Reading:) Interdiction is now
10 assisting Traffic in writing Traffic Citations as well
11 as Traffic Warnings, and will possibly be added to the
12 "TSU On Call" list to assist with Fatalities and
13 Critical Incidents.

14 Did I get that right?

15 A. Yes, ma'am.

16 Q. What is the TSU on-call list?

17 A. Traffic safety unit on-call list.

18 Q. Okay. Can you explain to me what that is?

19 A. So our traffic safety unit is our traffic unit
20 and they are responsible for handling all major
21 accidents and fatalities.

22 Q. Okay. And what -- what does the on-call list
23 mean?

24 A. So they would be called out to assist the
25 traffic safety unit.

1 Q. Okay. So if like there's like a big crash or
2 something?

3 A. Correct. Yes, ma'am.

4 Q. The criminal interdiction deputies would be
5 called to help with that?

6 A. Correct.

7 Q. Okay. In the first part where "interdiction is
8 now assisting Traffic in writing citations as well as
9 Traffic Warnings", does that mean before September
10 of 2021, interdiction was only writing traffic warnings?

11 A. No. So I'm going to assume what he meant by
12 this was whatever citations or warnings that they wrote
13 would be counted with the citations and warnings that
14 the traffic safety unit would document.

15 Q. Okay. So does that mean that interdiction
16 traffic citations and warnings were then getting double
17 counted as interdiction traffic warnings and citations
18 and traffic unit citations and warnings?

19 A. No. Before interdiction was by itself, the
20 warnings and citations would be just part of
21 interdiction. Now it would be part of the traffic
22 safety unit numbers.

23 Q. Okay.

24 A. I believe. I don't know for -- for sure what
25 he meant by that.

1 Q. Okay. Let's go to page 22. And to me, this
2 "Criminal Interdiction Stats: May 1, to Present" looks
3 like statistics about the criminal interdiction unit's
4 activities. Is that a fair assessment?

5 A. Yes, ma'am.

6 Q. Do you know how these statistics were
7 generated? Like, where do they come from?

8 A. I assume it would be from the interdiction
9 unit's activities.

10 Q. Right. And so how would you create this? Were
11 you, Sergeant Gamboa, keeping a list?

12 A. I may have been, yes, ma'am.

13 Q. Okay. And where did you get the information in
14 your list?

15 A. From the deputies.

16 Q. So the deputy would call you and say I made a
17 traffic stop?

18 A. Correct.

19 Q. And then you'd write it down in your booklet?

20 A. Correct.

21 Q. Okay. What is "Officer Initiated Activity" on
22 the first line?

23 A. Anything that is initiated by the officer,
24 traffic stops, contacts, field contacts, gang con --
25 contacts, things of that nature.

1 Q. Okay. So officer initiated activity could
2 include traffic stops plus talking to someone on the
3 street?

4 A. Yes, ma'am.

5 Q. Got it. And so as a subset, there is 261
6 traffic stops of the officer initiated activity of 271?

7 A. Correct.

8 Q. Got it.

9 I'm going to hand you a calculator.

10 A. Sure.

11 Q. And 261, which is the number of traffic stops,
12 minus 217. To me, I get 44 stops without warnings?

13 A. Correct.

14 Q. Okay. And then I see citations issued. Can
15 you subtract 18 from that 44?

16 A. 26.

17 Q. Okay. So these are 26 traffic stops without
18 warnings or citations. Do you know what's going on with
19 these 26 traffic stops?

20 A. It could have been arrests.

21 Q. Okay. So arrests would not fall into the
22 citations or warnings issues bucket?

23 A. Correct.

24 Q. Okay. But then I see a "persons arrested"
25 number. And that's 64.

1 A. Okay.

2 Q. So can you help me understand the difference
3 there, like, why would there be 64 arrests and then 26
4 potential arrests that were neither warnings nor
5 citations?

6 A. Well, it just depends. I mean, multiple people
7 in vehicles. It could be they went to a call and
8 arrested somebody, things of that nature.

9 Q. Okay. Can you take 64 and divide that by 271.
10 So 64 persons arrested, divided by 271 officer initiated
11 activity?

12 A. 4.23.

13 Q. 64 divided by 271. Are you sure?

14 A. 4.23.

15 Q. Let me make sure I'm doing that right.

16 MS. HEBERT: Josh, can you check my math?

17 MR. WINDHAM: I get .236.

18 Q. (BY MS. HEBERT) Okay. Let's try that again.
19 64 divided by 271?

20 A. 64. 271. Okay. .236.

21 Q. Okay. Does that mean 20 percent -- 23 percent
22 of officer initiated activity here is generating 64
23 people, there's 23 percent of arrests. So let me
24 rephrase that.

25 23 percent of these officer -- officer

1 initiated activities are generating arrests?

2 A. So the officer initiated activity number could
3 be anything, right. So they could be following up on
4 traffic hazards.

5 Q. Sure.

6 A. So -- so that wouldn't -- I mean, potentially
7 be, you know, they've arrested off of that officer.

8 Q. Right-- right. But that would mean, I guess,
9 to put a finer point on it, only 23 percent of the 271
10 officer initiated activities were leading to arrests.
11 So the vast majority of these officer initiated
12 activities, all those things that you just summarized
13 are officer initiated activities would not lead to
14 arrests?

15 A. Correct.

16 Q. Okay. Can we go down to "Estimated Value
17 Recovered"?

18 A. Yes, ma'am.

19 Q. And I see 30,000?

20 A. Uh-huh.

21 Q. Where did this number come from?

22 A. Probably from the recovered stolen vehicles.

23 Q. Okay. And what happens to recovered stolen
24 vehicles? We looked at one instance in a
25 commissioner -- county commissioner meeting minute notes

1 where the organized crime division received the seized
2 vehicle. What happens otherwise?

3 A. So stolen recovered vehicles would be returned
4 to the owners.

5 Q. Okay. And that's helpful.

6 Okay. Can we flip to the next page?

7 A. Sure.

8 Q. And about four lines down or the last four
9 lines of the first section says, (Reading:) Consent
10 search, search(s) hours, probable cause search, and
11 other activities.

12 Do you see those lines?

13 A. Yes, ma'am.

14 Q. And I'm seeing 123 consent searches?

15 A. Correct.

16 Q. Does that mean that this is the number of times
17 that a driver consented to be searched during this
18 period?

19 A. Yes, ma'am.

20 Q. Okay. And, again, how did you get this number?
21 By your deputies just calling and telling you about it?

22 A. Correct.

23 Q. Okay. And is there any record here, just
24 looking it over, I'm not seeing it, but if I'm missing
25 it, tell me.

1 A. Okay.

2 Q. About times that folks said no to consenting to
3 search?

4 A. No, no actual line.

5 Q. Okay. And probable cause searches, I see 53?

6 A. Correct.

7 Q. And my understanding is those are searches
8 where the officer identified probable cause to do the
9 search?

10 A. Absolutely.

11 Q. And there was no consent to those situations?

12 A. Correct.

13 Q. And I see it -- just to go back a little bit
14 higher, training hours?

15 A. Okay.

16 Q. 141.5; is that right?

17 A. Yes, ma'am.

18 Q. Does that mean that the criminal interdiction
19 unit as a whole had 141 hours during this time period?

20 A. Total, total, yes, ma'am.

21 Q. Okay. And were all of those training hours
22 outside of Bexar County from outside training sources?

23 A. Well, it's just training hours. So it could be
24 in-service training, it could be court testimony
25 training.

1 Q. So it might not -- sure. It might not be
2 criminal interdiction specific training. Like, the
3 broad umbrella of any training criminal interdiction
4 did.

5 A. Yes, ma'am. Yes, ma'am.

6 Q. Okay. I see the next section is about
7 different narcotics seized. Is that fair?

8 A. Yes, ma'am.

9 Q. And I see the last one, 28,569 currency seized?

10 A. Yes, ma'am.

11 Q. Does that mean that this was the amount of
12 money in the time period we're talking about that
13 criminal interdiction deputies seized from vehicles?

14 A. Well, just total money that they've seized.
15 Not --

16 Q. Not just from vehicles?

17 A. Not just vehicles.

18 Q. Okay. So other places, too?

19 A. Correct.

20 Q. And where would those other places be?

21 A. I mean, it could be hotels. It could be any
22 search warrants that were conducted, things of that
23 nature.

24 Q. Okay. So any time the criminal interdiction
25 unit was involved?

1 A. Was involved. Yes, ma'am.

2 Q. Could you -- on our little handy-dandy
3 calculator. Would you mind doing a little math for me.
4 I think I remember you telling me that the sheriff's
5 office gets 30 percent of funds received?

6 A. I believe that's what it is now, yes, ma'am.

7 Q. Okay. Was it a different amount at this time?

8 A. I don't know. It could have been. At the
9 time, I didn't know what it was.

10 Q. Right. So as far as you know, the rule has
11 always been 30 percent?

12 A. Could have been, yes, ma'am.

13 Q. Okay. Can you do 30 percent of 28569, so times
14 28569 by .3? I know we're testing everybody's -- yeah.

15 A. 569. I'm sorry 28569.

16 Q. Times .3?

17 A. Times .3. 8570 -- .70.

18 Q. So does that mean that assuming that the
19 30 percent is right, the sheriff's office would have
20 taken home \$8,570.70 from this amount?

21 A. Yes, ma'am.

22 Q. Okay. Thanks. All right. I think you can
23 give my calculator back hopefully. Appreciate that.

24 And then I go to another page. Let me just
25 find the next page. Page 27. And if you wouldn't mind,

1 we'll just date this one to see what the date looks
2 like. The date on this would be September 17th, 2021;
3 is that right?

4 A. 9 -- oh, I'm sorry. Yes, ma'am.

5 Q. Okay. And I'm going to read this bullet item
6 that we see on the top page of 27. (Reading:) Sheriff
7 Jim Skinner out of Collin County SO, came out and the
8 meeting was a huge success with lots of information
9 passed about their Criminal Interdiction. The Sheriff's
10 approached Sergeant Pete Gamboa that at the next meeting
11 they would like to include a target date to begin the
12 South/Central Criminal Interdiction Unit.

13 Did I read that correctly?

14 A. Yes, ma'am.

15 Q. Okay. So what I'm taking away from this bullet
16 is that Sheriff Skinner visited Bexar County. Is that
17 fair?

18 A. Yes, ma'am.

19 Q. What kind of information did he pass along at
20 that time?

21 A. I'm sure he talked about their task force and
22 operationally, how it's working with the -- with the
23 counties that are involved and probably some success
24 stories of what has been done over there.

25 Q. Okay. And would he have shared any, like,

1 how-tos?

2 A. He may have. Matter of fact, he talked about
3 how in their region, their commissioners were very
4 proactive for the interdiction unit.

5 Q. Okay. What do you mean by "commissioners"?

6 A. Like, they supported their idea.

7 Q. Is this the county commissioners, then?

8 A. Correct.

9 Q. Okay. So the county -- he talked about how the
10 county commissioners were supportive?

11 A. How they're -- yeah. In their regions, yes,
12 ma'am.

13 Q. Okay. And what is -- I have no idea how this
14 works. So what does support from the county
15 commissioners look like?

16 A. So they would have -- they would approve the
17 actual task force moving -- you know, to move forward,
18 to work together.

19 Q. Got it. So approval for the task force had to
20 go through the county commissioners?

21 A. Correct.

22 Q. Got it. And the next sentence, "the
23 Sheriff's", and that has the sheriff's apostrophe S,
24 approached Sergeant Pete Gamboa.

25 Does that mean multiple sheriffs, is that

1 just a typo, approached you? Or --

2 A. No, multiple.

3 Q. Okay. So who approached you?

4 A. I couldn't remember exactly who. But I know it
5 was multiple of them.

6 Q. Okay. So some collection of sheriffs from the
7 surrounding area approached you?

8 A. Yes, ma'am.

9 Q. Were you at this meeting with the --

10 A. I believe so, yes.

11 Q. Okay. And do you remember what the target date
12 was to begin this south/central criminal -- criminal
13 interdiction unit?

14 A. I don't remember a target date. I know we
15 talked about trying to get this because our -- our
16 problem for Bexar County was to try to get commissioners
17 court to authorize us to be involved in this task force.

18 Q. Okay. And why was that a problem for -- for
19 y'all?

20 A. Just different reasons. I mean, they wouldn't
21 always see eye to eye with the sheriff and some of the
22 things that he wanted to conduct here in Bexar County.

23 Q. Okay. And did the south/central criminal
24 interdiction unit ever start?

25 A. No, ma'am. No, ma'am.

1 Q. What happened?

2 A. So eventually when migrants started coming over
3 to the United States and teenagers were being recruited
4 to transport these migrants over, they would get into
5 pursuit, vehicle pursuits, where sometimes it would end
6 up in someone being hurt or killed.

7 Q. Okay.

8 A. So the sheriff kind of at that point --

9 Q. Nixed it.

10 A. -- nixed it.

11 Q. So, but -- do you remember what point the
12 sheriff nixed it?

13 A. At what point?

14 Q. Yeah, what time period?

15 A. I don't.

16 Q. It's okay.

17 A. I don't.

18 Q. Were there emails back and forth with other
19 counties about setting this south/central criminal
20 interdiction unit up?

21 A. There could have been, yes, ma'am.

22 Q. And did you ever see a draft MOU?

23 A. No.

24 Q. Okay. So you never got to the point of
25 drafting MOUs with the other counties?

1 A. No, ma'am.

2 Q. And then the rest of this page 27, I see
3 "Criminal Interdiction Stats: May 1 to -- To Present".
4 Is that fair?

5 A. Yes, ma'am.

6 Q. And it looks like the officer initiated
7 activity is up to 286. Does this just mean there were
8 additional things added the next week --

9 A. Yes, ma'am.

10 Q. -- to the original stats we looked at on page
11 whatever that was before?

12 A. Yes, ma'am.

13 Q. Okay. Can we go to the next report. So this
14 will be the report for Friday, September 26th, 2021.

15 A. September 24th?

16 Q. Oh, you're right. September 24th. And just
17 briefly, I see the -- the interdiction stats on page 32;
18 is that right?

19 A. Yes, ma'am.

20 Q. Okay. I can skip on to the next one.

21 This is Friday, October 1st, 2021?

22 A. Yes, ma'am.

23 Q. And I see "Accomplishments" on page 35,
24 (Reading:) Interdiction has made a point of contact
25 with UPS on interdicting parcels. And Interdiction

1 Deputies have assisted BCSO Patrol multiple calls for
2 service, along with OCD and TSU with several critical
3 incidents.

4 Did I read those right?

5 A. Yes, ma'am.

6 Q. And I understand the accomplishments there,
7 there's some kind of contact with the United States
8 Postal Service. Is that fair?

9 A. No, it's UPS. Yeah, the company, not the --

10 Q. Not the U.S. version?

11 A. Right.

12 Q. Sorry. I always get those confused. UPS
13 versus USPS. This is -- this the private company, UPS?

14 A. Yes, ma'am.

15 Q. Got it. And then there were some assisting
16 with other sheriff's office units. Is that fair?

17 A. Correct.

18 Q. Okay. Does that mean that the big
19 accomplishments for that week was only those two things.
20 I guess -- that's a better way of getting at the point,
21 there weren't any big drug findings or money findings
22 during that period?

23 A. I -- I don't believe so.

24 Q. So if there was like a big bust or big stop
25 that yielded, let's say, kilos of drugs, that would have

1 been reported here in the accomplishments section?

2 A. Should have, yes, ma'am.

3 Q. Okay. So in this report, and I'm flipping
4 through pages 35 through 37. I'm not seeing the
5 criminal interdiction stats here.

6 A. Okay.

7 Q. Do you know why? Like, what happened?

8 A. I don't know. He may not have included it for
9 this particular week.

10 Q. Sure. And just to be fair, like, I don't see
11 the criminal interdiction stats in, like, any other
12 weekly -- weekly reports, like, going forward. Do you
13 know why those stats dropped out?

14 A. No.

15 Q. Okay. Did you still give Lieutenant Ortega
16 stats?

17 A. I'm sure I would have if we were giving him
18 stats, yeah.

19 Q. Okay. So in -- at the end -- we're looking at
20 the end of September of 2021, you still collected stats
21 on interdiction activities in September of 2021?

22 A. Possible, yes.

23 Q. Okay. But you don't exactly remember sitting
24 here?

25 A. I don't exactly remember, yeah.

1 Q. And how did you collect those stats? Did you
2 take notes?

3 A. Notes, daily activity reports that the officers
4 would -- would submit.

5 Q. Okay.

6 A. But at some point, and I can't remember exactly
7 when, and this may be the time when they wouldn't submit
8 them to me anymore. They would submit them straight to
9 our office assistant.

10 Q. Okay. So at some point, you, Sergeant Gamboa,
11 stopped collecting all the weekly interdiction reports,
12 the daily interdiction reports?

13 A. Right.

14 Q. And it went to some admin?

15 A. Right.

16 Q. Okay. Got it. And can you tell me more about
17 these daily interdiction reports? What are we talking
18 about? What is a daily interdiction report?

19 A. Just their daily activities of what they did
20 that day.

21 Q. Is there a form they fill out?

22 A. Yes, ma'am.

23 Q. Okay. So did you require your criminal
24 interdiction activities to fill out this daily activity
25 report?

1 A. Yes, ma'am.

2 Q. So every day Deputy Gereb was on the job doing
3 criminal interdiction, he would have filled out a
4 report?

5 A. Yes, ma'am.

6 Q. Every day that Deputy Babb was on the job doing
7 criminal interdiction, he would have filled out a
8 report?

9 A. Yes, ma'am, should have, yes, ma'am.

10 Q. Did you ever hear about or learn about, did you
11 ever learn about them not filling out that report?

12 A. So when I was collecting them, there would be
13 times where I would -- I would ask them, hey, I haven't
14 gotten your report for Monday, you know. I need to get
15 that.

16 Q. Sure. So you would follow up?

17 A. Yes.

18 Q. And if they didn't turn in their report, there
19 would be a problem?

20 A. Yeah, I mean...

21 Q. You would say, deputy -- deputy, I need your
22 report?

23 A. Yeah.

24 Q. And you would get it?

25 A. Yeah.

1 Q. If they didn't turn in the report, what would
2 happen?

3 A. They would do it the next day or, you know,
4 before they went out somewhere, I would make them do
5 their report.

6 Q. So they would follow your order?

7 A. Yes, ma'am.

8 Q. Okay. And if they didn't follow your order
9 what would you do? Let's say, you know, I'm a bad
10 student. Let's say I don't do my homework and I refused
11 to fill out my report after you ordered me to?

12 A. It never -- yeah, it never got to that point --

13 Q. Sure.

14 A. -- but, I mean, worst-case scenario, then they
15 would be at the office doing reports.

16 Q. You'd bench them?

17 A. Yeah.

18 Q. Got it. Okay. So let's flip to page 37. And
19 in the follow-up section on page 37, the second bullet,
20 can I read that to you?

21 A. Yes, ma'am.

22 Q. (Reading:) Need to setup having BCSO
23 Interdiction Unit deputies head to Collin County SO to
24 observe and TRNG with the North Texas Interdiction Unit
25 for additional hands on TRNG.

1 Did I read that right?

2 A. Yes, ma'am.

3 Q. So there's a couple of, like, abbreviations in
4 here, so I want to make sure that I'm actually
5 understanding what's being said.

6 A. Sure.

7 Q. It seems like this bullet is saying that the
8 sheriff's office needed to set up having its
9 interdiction deputies go to Collin County to their
10 sheriff's office to observe and train with the north
11 Texas interdiction unit for additional hands-on
12 training.

13 Is that -- unpacking all the shorthand and
14 abbreviations, is that what that says?

15 A. Yes, ma'am.

16 Q. Okay. And is this a second time, then, that
17 Bexar County Sheriff's Office deputies went to Collin
18 County?

19 A. So no. So the first time I went.

20 Q. Just you?

21 A. Yes, ma'am.

22 Q. Understood. And this second time, you sent the
23 deputies out?

24 A. They went, yes, ma'am. But I -- if I'm not
25 mistaken, I think it never happened because they

1 rescheduled.

2 Q. Sure.

3 A. And then our schedule was conflicting so
4 they --

5 Q. We can check as we go. But that would -- this
6 was -- you went at the formation --

7 A. Correct.

8 Q. -- of the criminal interdiction unit and then
9 you sent your -- or tried to send your deputies later?

10 A. Yes, ma'am.

11 Q. Okay. And let's go to page 39 and the date on
12 this report would have been October 18th, 2021?

13 A. Yes, ma'am.

14 Q. If you wouldn't mind going to the ongoing
15 business. (Reading:) Had followup meeting last week at
16 TAG six counties: Kendall, Kerr, Gillespie, Live Oak,
17 and Atacosa --

18 A. Atascosa.

19 Q. -- Atascosa to continue with SA area South
20 Texas Interdiction.

21 Is this bullet referring to the
22 interdiction task force we've talked about combining
23 efforts from different counties?

24 A. Yes, ma'am.

25 Q. Okay. And are these the counties that Bexar

1 County, this counties listed here on page 39, the
2 counties that Bexar County was attempting to collaborate
3 with?

4 A. Yes, ma'am.

5 Q. And who attended on behalf of all the counties?
6 Were they deputies or the sheriffs or some other person?
7 Like, who was there?

8 A. I believe most of them were the sheriffs
9 themselves.

10 Q. Okay.

11 A. But they may have -- I'm trying to remember if
12 it was all sheriffs. It was all the sheriffs and they
13 may have had somebody with them, I guess with them.

14 Q. An attaché of sorts?

15 A. Yeah.

16 Q. Were you at this meeting?

17 A. I believe so, yes.

18 Q. Was Sheriff Salazar at this meeting?

19 A. Yes.

20 Q. Okay. Can we flip to page 42. And this report
21 is from October 25th, 2021. Is that fair? Looking at
22 the prior page on 41, October 25th, 2021?

23 A. Yes, ma'am.

24 Q. Okay. Would you mind looking at the third
25 bullet in the "Accomplishments" section? Do you see

1 where it says "our Interdiction Unit is currently in
2 Negotiator Training"?

3 A. Yes, ma'am.

4 Q. I'm going to read the whole thing, rephrase.

5 (Reading:) Our Interdiction Unit is currently in
6 Negotiator Training. This Training will help
7 tremendously on Interdiction Stops.

8 Did I read that right?

9 A. Yes, ma'am.

10 Q. Okay. Why negotiator training for interdiction
11 stops, how would that help?

12 A. Communication.

13 Q. Tell me more about that?

14 A. Okay. So they learn to communicate, learn to
15 ask better questions with the drivers.

16 Q. Okay. So would it be fair to say that the
17 negotiator training was -- was training your
18 interdiction deputies to conduct interviews?

19 A. To help them conduct interviews, yes, ma'am.

20 Q. Okay. And at time of October 2021, the
21 deputies who attended this would have been Deputy Gereb
22 and Deputy Babb. Is that fair?

23 A. Correct.

24 Q. Would you mind flipping to the next page?

25 A. Sure.

1 Q. 43. This is a long bullet for the "For Follow
2 Up" sections so I'm not going to read the whole thing.
3 Just feels large. Would you mind reviewing it? Let me
4 know when you're done.

5 A. Yes, ma'am.

6 Q. Okay. So it seems like to me six counties
7 committed to joining the task force, although it says
8 unit. I think this was referring to the task force that
9 we've talked about previously?

10 A. Yes, ma'am.

11 Q. By task force, we mean the joint interdiction
12 task force that would have been across several counties?

13 A. Correct.

14 Q. And would those six counties have been the
15 counties we saw previously, Kendall, Kerr, Gillespie,
16 Live Oak, Atascosa?

17 A. Atascosa.

18 Q. Atascosa, why do I struggle with that one?
19 Kendall, Kerr -- Kerr -- Kendall, Kerr, Gillespie, Live
20 Oak, Atascosa, those would be the six counties?

21 A. Yes, ma'am.

22 Q. Okay. And what did -- how did they commit to
23 the unit? Did they just say yes, we're going to it?

24 A. Yes, ma'am.

25 Q. And I see this next part about sending out a

1 last email for any others to jump on. Who would this
2 email go to?

3 A. Any -- any of the other counties that had
4 attended the meetings prior.

5 Q. Okay. So there would have been some email sent
6 to other counties saying, hey, come join our criminal
7 interdiction task force?

8 A. Would you like to, yes, ma'am.

9 Q. Okay. The verbiage -- the last sentence;
10 "Verbiage will need to be added to Inter Local
11 Agreement."

12 Did I get that right?

13 A. Yes.

14 Q. What is the interlocal agreement?

15 A. That would be that MOU that would be signed
16 between the different counties.

17 Q. For the task force?

18 A. Correct.

19 Q. So it sounds like then it was already drafted?

20 A. No.

21 Q. No?

22 A. No, but it would -- it would need to be.

23 Q. Oh, and is that in reference to this prior
24 sentence about, "My suggestion is for Bexar County to be
25 part of both since we are the HUB"?

1 A. Correct. Correct.

2 Q. Okay. So it seems like reading this paragraph
3 then, together, there was a proposal that there be two
4 separate task forces?

5 A. Yes, ma'am.

6 Q. And Bexar County would be part of two separate
7 task force?

8 A. Correct.

9 Q. Because they're in the middle?

10 A. Right.

11 Q. And there would need to be words reflecting
12 that fact?

13 A. Yes, ma'am.

14 Q. I'm understanding all of that right?

15 A. Yes, ma'am.

16 Q. Okay. We're done with that page. I'm going to
17 see if I've got anything else. Okay, let's go to
18 page 59. And looking at the prior page, 58, the date on
19 this report would be November 26th, 2021?

20 A. Yes, ma'am.

21 Q. Okay. And then I see "Critical Issues," the
22 first bullet in "Critical Issues" section. (Reading:)
23 We need to send our two Interdiction deputies to North
24 Texas Interdiction Unit to receive OTJ TRNG from those
25 deputies.

1 Am I reading that correctly?

2 A. Yes, ma'am.

3 Q. And I understand the abbreviations in this
4 sentence to be on-the-job training from those deputies?

5 A. Correct.

6 Q. Okay. And it seems like as of November 2021,
7 that training that we talked about earlier had not
8 happened. Is that fair?

9 A. Correct.

10 Q. Why was that training -- there's a discussion
11 about training in other places in this report. Why was
12 it moved to critical issues. Do you know?

13 A. I believe they had -- our command staff had not
14 made the decision to allow them to travel to attend that
15 training.

16 Q. Okay. So it's like, we need to do this now?

17 A. Yeah.

18 Q. Okay. Was there a particular reason that you
19 and Lieutenant Ortega felt that the deputies needed
20 additional training?

21 A. No, just -- just to help them be better at what
22 they're doing.

23 Q. Okay. And the two interdiction deputies at
24 that time were Deputy Gereb and Deputy Babb?

25 A. Correct.

1 Q. Okay. Looking to see if there's anything else
2 in this section. Bear with me. Okay. If you wouldn't
3 mind flipping to page 71, I think that's the next one.
4 It looks like 71, "Accomplishments." The first bullet
5 of that section. And this report, just to date it, this
6 report would have been completed December 19th, 2021; is
7 that right?

8 A. Yes.

9 Q. Okay. The first bullet in the
10 "Accomplishments" sections -- section, (Reading:)
11 Travel Request Forms completed to Interdiction Unit
12 deputies To North Texas Interdiction Unit to receive
13 on-the-job training from North Texas Interdiction Unit.

14 Did I read that correctly?

15 A. Yes, ma'am.

16 Q. Does this mean that the travel forms were
17 completed for the two interdiction deputies to go to
18 that training?

19 A. Yes, ma'am.

20 Q. And tell me about the travel request, are those
21 preauthorization forms or retroactive authorization
22 forms?

23 A. No, they're retro.

24 Q. They're retro?

25 A. Well, I'm sorry. We -- it does happen. But --

1 so we -- I would have filled out the form and turned it
2 in so that way they can get approved to attend that
3 training.

4 Q. Okay. So these would have been forms that were
5 completed and approved before they went to training?

6 A. Correct.

7 Q. Got it. I think that we're done with the 2021
8 report. You get to keep that exhibit, so don't worry.
9 I just have them separated by years. I'm going to flip
10 to the 2022 reports. And would you mind going to
11 page 98 of your exhibit?

12 MS. HEBERT: Which exhibit is this again?

13 MR. WINDHAM: 71?

14 Q. (BY MS. HEBERT) 71.

15 A. Yes, ma'am.

16 Q. And I understand the date on this report would
17 have been February 18th, 2022; is that right?

18 A. Yes, ma'am.

19 Q. Can you look at the "Critical Issues" section.
20 And the second bullet, I'm going to read it, (Reading:)
21 Need more deputies to expand Interdiction Unit.

22 A. Yes, ma'am.

23 Q. Did I read that right?

24 A. Yes, ma'am.

25 Q. Was it Bexar County Sheriff's Office intention

1 to expand the interdiction unit at this time?

2 A. Well, just looking at the bullet above it, I'm
3 asking to get back the two positions that -- that were
4 reassigned --

5 Q. Sure.

6 A. -- and trying to get them -- those two
7 positions back to expand from two man to a four-man
8 team.

9 Q. So at the very least, you wanted four deputies
10 to be doing criminal interdiction?

11 A. Yes, ma'am.

12 Q. If they had given you more, let's say they gave
13 you six deputies total, would you have been happy with
14 that?

15 A. Absolutely.

16 Q. You would have accepted that?

17 A. Yes, ma'am.

18 Q. Okay. I think we're going to skip a big
19 section to 107. And the date on this report is
20 February -- excuse me, March 11th, 2022. Did I read
21 that right?

22 A. Yes, ma'am.

23 Q. So I want to look at the "New Business."
24 (Reading:) All Spec. Enforcement Unit deputies will be
25 relocating offices from 490 HQ to the TAG building with

1 the rest of OCD units due to Sergeant Gamboas transfer
2 to OCD Intel.

3 Did I read that right?

4 A. Yes, ma'am.

5 Q. So is this the time period when you were
6 transferred from the training academy to the criminal --
7 or to the organized crime division?

8 A. No. So I was -- I was assigned to our
9 headquarters at that -- at this time and from
10 headquarters moved to the TAG -- to the intel unit.

11 Q. Okay. So they moved you buildings?

12 A. Yes.

13 Q. Did you change supervision structures at that
14 point?

15 A. No, because that's, I believe -- well, I'm
16 trying to think. So Lieutenant Ortega was --

17 Q. Which one? Ray Ortega?

18 A. Ray.

19 Q. Got it.

20 A. He was reassigned from the academy to now the
21 SWAT commander under the organized crime division.
22 And -- and had -- and still had the uniform officers
23 under -- under him, under his umbrella.

24 Q. Okay.

25 A. So -- so we were under his umbrella, but he's

1 kind of the one that had changed, moving over to the
2 TAG. So we still fell under him.

3 Q. Okay. So you were moved to a different
4 building --

5 A. Yes.

6 Q. -- with Lieutenant Ortega?

7 A. Correct.

8 Q. Okay.

9 A. So I had two bosses at that time. So I had
10 Lieutenant Ortega or the uniform officers, which special
11 enforce -- enforcement fell under. And then I was also
12 under Lieutenant Freveletti for the covert.

13 Q. Got it. Okay. And was Lieutenant Freveletti
14 also in the TAG building?

15 A. Yes, ma'am.

16 Q. Got it. Okay, we can skip that. I think we
17 already covered that one. Can we look at page 143? And
18 this report is from June 12th, 2022; is that right? I'm
19 sorry. I went too fast for you. Page 143.

20 A. Okay. June 12th, yes, ma'am.

21 Q. So June 12th, 2020?

22 A. 2.

23 Q. 2.

24 A. Yes, ma'am.

25 Q. Can you look at the "Accomplishments" section?

1 A. Sure.

2 Q. And, (Reading:) Interdiction unit conducted a
3 small bust interdiction operation at the Greyhound Bus
4 Station Downtown on Friday 06/10.

5 Did I get that right?

6 A. Yes, ma'am.

7 Q. Can you tell me what this is about?

8 A. So the unit went downtown to the Greyhound bus
9 and was conducting consensual contacts, anything where
10 they may have intercepted either people with warrants,
11 people that may have been transporting narcotics or
12 currency, anything illegal, things of that nature.

13 Q. So, I mean, can you explain to me how that
14 worked here? Because, you know, you're not doing
15 traffic stops. So are you just, you know, pulling
16 people over to the side and saying?

17 A. Can I talk to you?

18 Q. Okay. And then you talk to them, and what
19 happens during that?

20 A. And so they may have made contact with somebody
21 that was traveling because they maybe had warrants,
22 maybe they were, you know, evading something from
23 somewhere else. So, you know, they would carry that
24 conversation on with them.

25 Q. Okay. So help me understand how -- unpack that

1 for me how it would work. You're -- I'm a person
2 traveling in this bus station. You're the interdiction
3 officer. Tell me -- tell me how it works?

4 A. So I'm -- I'm there in uniform and perhaps
5 somebody is getting off a bus and they're walking --

6 Q. I'm getting off the bus?

7 A. And you're walking towards me and you then you
8 notice that I'm law enforcement in uniform, and you
9 abruptly change your travel from walking towards me to
10 maybe to the office or somewhere else to now I'm going
11 somewhere else to avoid making contact.

12 Q. Okay. So it's just, like, change directions?

13 A. Yes.

14 Q. Okay. So then what happens?

15 A. So then, sir, ma'am, can I talk to you? You
16 know, yes. Are you here visiting? You know, you're
17 getting off the bus, you know. What are your plans?
18 Where are you going? And so if they -- if they answer
19 the questions and they continue asking questions to
20 maybe lead to, can I get your name, do you have any kind
21 of warrants, are you on parole, probation, are you a
22 gang member.

23 Q. Do they ask for ID?

24 A. Ask for ID and then they'll check them to see
25 if they've got any watch warrants. And then just

1 depends on what their answer is, what they find, you
2 know, if they make an arrest or they just end it there.

3 Q. Okay. And what if I had run away or I said,
4 no, I don't want to talk to you?

5 A. Well, I mean it's all based on consensual
6 contact. So if you ignore, you know, hey, ma'am, or hey
7 you, let me talk to you, if you ignore it, then -- then
8 it is what it is.

9 Q. Okay. Who was at this interdiction operation,
10 who was there? Do you remember?

11 A. It would -- it would have been probably --
12 well, I'm trying to think. If Gereb was still there --
13 I mean, Babb was still there at that time. I think he
14 still was.

15 Q. I don't know, so that's why I asked. I don't
16 know.

17 So if -- if it was -- if Deputy Babb was
18 there it would have been him and Deputy Gereb; is that
19 correct?

20 A. Correct.

21 Q. Was Deputy Molina there?

22 A. Could have been.

23 Q. Okay. So Deputy Molina and his K-9 could have
24 been there?

25 A. Correct.

1 Q. Okay. How would we know if Deputy Molina had
2 been at this interdiction unit, small bus interdiction
3 operation?

4 A. He would -- more than likely would have
5 included in his deployment records.

6 Q. Go it. Okay. That's helpful. Thanks.

7 Can you flip to the next page? 144,
8 "Whatever Happened To".

9 A. Yes, ma'am.

10 Q. And the MOU for surrounding counties south of
11 Bexar County: Atascosa, Medina, Frio, Live Oak,
12 et cetera, to move forward on South Texas Interdiction
13 Unit. Is this that MOU you were talking about
14 previously?

15 A. Yes, ma'am.

16 Q. And I guess they were checking in to find out
17 the status of that?

18 A. Correct.

19 Q. And, again, that wasn't drafted?

20 A. Right.

21 Q. Okay. Okay. I think we're going to flip --
22 skip a large chunk. Are you ready. Skip to 158. And I
23 understand this page -- this report to be from
24 July 17th, 2022; is that right?

25 A. July 17, 2022, yes, ma'am.

1 Q. Can you look at the "Accomplishments" section?

2 A. Sure.

3 Q. Bullet two. (Reading:) Friday 07/15

4 Interdiction Unit deputies assisted BCSO TFO assigned to
5 HIDTA DEA with a Tstop, which led to the arrest of a
6 subject with 10.5 kilos of methamphetamine narcotics in
7 the vehicle.

8 Did I read that correctly?

9 A. Yes, ma'am.

10 Q. Okay. So can you summarize for me what this is
11 about?

12 A. So we have deputies assigned to -- as task
13 force officers to DEA. They more than likely were
14 surveilling a suspect, narcotic courier, and so they
15 asked for the assistance of the interdiction unit to get
16 probable cause to conduct a traffic stop which ended up
17 recovering 10 and half kilos of methamphetamines.

18 Q. Okay. So this -- this particular traffic stop
19 was likely a target identified by this task force. Is
20 that fair?

21 A. Yes, ma'am.

22 Q. And does that mean a criminal interdiction unit
23 deputy made the traffic stop?

24 A. Correct.

25 Q. Okay. And the task for the criminal

1 interdiction unit deputy was to develop probable cause
2 to do the search?

3 A. To make the stop.

4 Q. To make the stop. Okay. So just to make the
5 stop?

6 A. Correct.

7 Q. So once they have probable cause to make --
8 make the stop, then what would happen?

9 A. Then they would conduct their field interview
10 to gain access into the vehicle.

11 Q. Okay. Got it.

12 MR. ELLSWORTH: Can we take a break?

13 MS. HEBERT: Yeah. Let's take a break.

14 Now is a great time to take a break.

15 MR. WINDHAM: Hold on a second.

16 MS. HEBERT: Yeah, before I -- this is a
17 good task, before we take the break, Charles, would you
18 mind just emailing us the criminal interdiction unit job
19 description, the deputy job description. We can
20 probably use it here.

21 MR. FRIGERIO: Yeah, I can get it. I think
22 it actually is part of what we gave you, but he sent me
23 one this morning --

24 MS. HEBERT: I haven't -- I haven't seen it
25 so if you wouldn't mind just, like, while we're

1 breaking --

2 MR. FRIGERIO: Yeah, sure.

3 MS. HEBERT: -- sending that so we can look
4 at it.

5 MR. FRIGERIO: Do you prefer email or
6 paper?

7 MS. HEBERT: If you've got paper, I'll just
8 take some time to process it. That would be great.

9 All right. We're off the record for a few
10 minutes. 10 minutes.

11 (Brief recess.)

12 Q. (BY MS. HEBERT) We're back on the record after
13 a short break. I'd like to look at page 166 of
14 Exhibit 71. And I understand the date of this report is
15 August 7th, 2022. Can you confirm that when you get a
16 chance?

17 A. August 7th, 2022, yes, ma'am.

18 Q. Okay. And if you wouldn't mind looking at the
19 "Critical Issues" section.

20 A. Sure.

21 Q. The second bullet, (Reading:) Deputy Babb was
22 recently transferred to TRNG Academy. Sheriff Salazar
23 and CD Schuler gave verbals last week that the position
24 would be filled ASAP.

25 Did I get that right?

1 A. Yes, ma'am.

2 Q. Why did they want the position vacated by
3 Deputy Babb to be filled ASAP?

4 A. Because he would be the only one, you know,
5 working the interdiction.

6 Q. Okay, so you mean Deputy Gereb would be by
7 himself?

8 A. Correct.

9 Q. And you wanted a two-man team?

10 A. Yes.

11 Q. Got it.

12 MS. HEBERT: Let's do another exhibit.

13 Josh, would you do another stamp for the
14 next exhibit?

15 MR. WINDHAM: Sure. 74.

16 Q. (BY MS. HEBERT) Okay. I'm going to hand you
17 what's being marked Exhibit 74.

18 (Exhibit No. 74 was marked.)

19 Q. (BY MS. HEBERT) Would you take a look at this
20 document?

21 A. Yes, ma'am.

22 Q. And when you've had a chance to review it,
23 would you mind telling me what it is?

24 A. This is the announcement for the opening for
25 the criminal interdiction unit.

1 Q. Is this the announcement for the job position
2 that Deputy Babb left?

3 A. Correct.

4 Q. Okay. And would it be fair to say that this is
5 the job description for the interdiction deputy as of
6 2022?

7 A. Yes, ma'am.

8 Q. Okay. Did you write this?

9 A. Yes, ma'am.

10 Q. Okay. You just hesitated a little bit there?

11 A. So some -- like, some of this stuff, like,
12 number 9, "You must not have been a recipient of any
13 disciplinary" -- that was taken from previous
14 announcements.

15 Q. Oh, okay. I mean, but you -- you assembled
16 this and said, this is the accurate description?

17 A. Yes, ma'am.

18 Q. Some of it you might have borrowed from prior
19 job descriptions. Is that fair?

20 A. Correct. Yes, ma'am.

21 Q. Okay. I understand. I want to look just
22 briefly at the "Preferred Qualifications."

23 A. Okay.

24 Q. And do you see items 3 through 8?

25 A. Yes, ma'am.

1 Q. Generally speaking, these are the specific
2 chapters of the sheriff's office's policy manual that a
3 criminal interdiction unit deputy would understand
4 applies to their direct day-to-day. Is that fair?

5 A. Yes, ma'am.

6 Q. And then I'd like to go back up to the
7 "Essential Duties and Responsibilities."

8 A. Okay.

9 Q. "Advanced criminal enforcement, driver
10 behaviors, and smuggling compartments." Would you
11 expect a criminal interdiction deputy to have those
12 skills like from the get-go or would you expect them to
13 develop those skills over time?

14 A. So I would like to have seen that they had some
15 training in that just to -- just for the sake of
16 learning curve is why I added that on there.

17 Q. Understood. Does that mean that the job
18 applicants for this position, like, listed out their
19 trainings for you?

20 A. Yes, ma'am.

21 Q. Okay. And then "Advanced criminal roadside
22 interview techniques." Would this be the same, they
23 would have listed out trainings that they had?

24 A. Correct.

25 Q. And does that mean that the roadside interview

1 was something that was part of almost every traffic stop
2 for interdiction?

3 A. Yes, ma'am.

4 Q. And that interview began as soon as the traffic
5 stop started or as soon as the traffic stop started. Is
6 that fair?

7 A. As soon as the driver contact was made.

8 Q. Understood. Okay. I think we can put this to
9 the side right now. I just want to make sure that we --
10 the date on this -- on this job description is
11 August 16th, 2022 on the second page. Is that fair?

12 A. Yes, ma'am.

13 Q. Okay. You can put this to the side for now.
14 I want to go back to our famous friend,
15 Exhibit 71.

16 A. Yes, ma'am.

17 Q. And I think we can skip a couple pages to page
18 176. And the date on this weekly report would be
19 September 5th, 2022. Did I get that right?

20 A. Correct.

21 Q. Okay. Would you mind looking at the "For
22 Follow Up" section at the bottom of page 176?

23 A. Yes, ma'am.

24 Q. And it seems like the bullets got a little
25 messed up here, so I just want to read the second

1 bullet.

2 A. Sure.

3 Q. (Reading:) Interdiction Unit interviews were
4 conducted. Deputy Louie Estrada from East Patrol first
5 shift was selected. (Status ETA of being transferred?)

6 Did I get that right?

7 A. Yes, ma'am.

8 Q. So it seems like the -- Deputy Babb transferred
9 out of the criminal interdiction unit as we looked at
10 just a couple minutes ago at the beginning of
11 August 2022 and then the position was filled
12 approximately four weeks later. Is that fair?

13 A. Yes, ma'am.

14 Q. Okay. Let's go to page 199. And I understand
15 the date of this weekly report is November 27th, 2022?

16 A. Yes, ma'am.

17 Q. Okay. "New Business". Go to that section.

18 A. Yes, ma'am.

19 Q. I want to read that one. (Reading:)
20 Interdiction Units will begin concentrating on
21 motel/hotel, bus/train station and airport interdiction
22 with UC TAG sections.

23 Did I get that right?

24 A. Yes.

25 Q. Can you explain to me, like, what's happening

1 in this -- this bullet?

2 A. So I believe it's probably around the time that
3 the criminal -- the actual criminal interdiction unit
4 was -- the mission had changed from highway interdiction
5 to assist with the UCs and TAG to be supportive of their
6 mission. So they would be concentrating not on
7 interdiction, but more assisting with what their follow
8 ups would be.

9 But at the same time, concentrating on --
10 at their discretion if they weren't working with TAG,
11 they would be working the motel, hotel, bus, train
12 stations, and airport.

13 Q. Got it. So who made that decision?

14 A. That was the sheriff's decision.

15 Q. Okay. So the sheriff decided to pull the
16 interdiction units off the highways and to focus on
17 these other things?

18 A. Correct.

19 Q. And these other things; we previously talked
20 about the interviews that the sheriff's office would do
21 at the bus station, the bus station operation?

22 A. Correct.

23 Q. Would the -- would the interdiction unit be
24 doing those kinds of interviews at the motel, hotel,
25 bus, train station, and airport interdictions?

1 A. Yes, ma'am.

2 Q. Okay. Was Deputy Molina part of this as well?

3 A. Could have been, yes, ma'am. Since he was
4 assigned to TAG, he may have been assigned to this also.

5 Q. So do you know whether he was going to these
6 hotel, motel, bus station, train station, and airport
7 interdiction?

8 A. I don't for sure. But like I said before, his
9 deployment records would probably reflect that.

10 Q. Okay. And at this time, which was
11 November 27th, 2022, was the criminal interdiction unit
12 still doing traffic stops or did they completely stop?

13 A. So, they -- I mean, they would do just like any
14 other patrolman. If they saw any kind of violation,
15 they could do traffic stop at their discretion.

16 Q. So it was at their discretion --

17 A. Right.

18 Q. -- whether they continued to do traffic stops?

19 A. Correct.

20 Q. Got it. Okay. Can we look at page 207? And
21 the date on this report is January 2nd, 2023.

22 A. Yes, ma'am.

23 Q. And if you wouldn't mind looking at the
24 "Critical Issues." It says, (Reading:) Need more
25 deputies to expand interdiction units -- Interdiction

1 Unit, excuse me.

2 Did I read that correctly?

3 A. Yes, ma'am.

4 Q. At this time in the beginning of 2023, were you
5 still asking to add more deputies back to interdiction?

6 A. Yes, ma'am.

7 Q. Okay. Let's look at page 213. I think we can
8 actually just skip this one. Skip that.

9 A. Okay.

10 Q. We've already kind of done that. We've done
11 that. Can we look at page 242? And just to date this,
12 it looks like to me this report is from Sunday,
13 May 14th, 2023. I'm actually looking at page 240 right
14 now.

15 A. Okay. Yes, ma'am.

16 Q. So I see in the subject here that it's "SpecOps
17 Units Weekly Reports", am I getting that right, the
18 subject?

19 A. Yes, ma'am.

20 Q. So we had previously looked at special
21 enforcement units in the -- on the first page -- on
22 page 1. And now it's labeled "SpecOps Units Weekly
23 Reports". Can you help me understand, like, did the
24 criminal interdiction unit then start falling under
25 special operations?

1 A. Yes, ma'am.

2 Q. Got it. So at one point, the criminal
3 interdiction just kind of blended into the special
4 operations unit?

5 A. Correct.

6 Q. Got it. On page 242, then, which is the report
7 for Sunday, May 14th, 2023, can we look at the last two
8 bullets on this page?

9 A. Sure.

10 Q. (Reading:) Interdiction Unit assisted with
11 TAG, T-A-G, VTCF and targeted West San Antonio, U.S.
12 Highway 90 West -- I don't think I read that right. I'm
13 going to start that over.

14 Interdiction Unit assisted with TAG VCTF
15 and targeted West San Antonio, U.S. Highway 90 West and
16 Military surrounding areas for gang and criminal
17 activity conducting pedestrian and vehicle stops.

18 Did I get that right?

19 A. Yes, ma'am.

20 Q. Okay. So what is TAG VCTF?

21 A. TAG is Texas Anti-Gang. VCTF is Violent Crimes
22 Task Force.

23 Q. Got it. Okay, that's helpful.

24 And help me understand this bullet. So it
25 sounding like interdiction unit worked with the TAG

1 violent crime unit and targeted a specific area for
2 pedestrian and vehicle stops. Am I understanding that
3 correctly?

4 A. Yes, ma'am.

5 Q. And what does that mean in this context? Walk
6 me through what's happening.

7 A. So they're working the area and making contact
8 with people who may have any kind of violent crimes
9 warrants or they're doing any kind of violent crimes
10 criminal activity, things of that nature.

11 Q. So as I understand it, then, they're doing the
12 same kind of pedestrian stops we talked about with the
13 bus station?

14 A. Correct.

15 Q. They're saying, hey, can I talk to you, and
16 then talking to people and interviewing them. Is that
17 fair?

18 A. Correct.

19 Q. Vehicle stops, same thing. They're stopping
20 people for some kind of traffic violation --

21 A. Right.

22 Q. -- and then interviewing them?

23 A. Correct.

24 Q. Okay. I think we can skip the rest of that.

25 Can we look at page 246, which the date of that would be

1 May 28th, 2023?

2 A. Yes, ma'am.

3 Q. Can we look at the "Accomplishments" bullet
4 section and look at the first one?

5 A. Sure.

6 Q. I see like a repeat Monday 5/22. I'll skip
7 that part. (Reading:) SOU uniformed deputies targeted
8 UBC C10 West SATX with proactive traffic stops and
9 pedestrian stops on suspected criminal and gang
10 activity.

11 Did I get that right?

12 A. Yes, ma'am.

13 Q. Okay. What is SOU?

14 A. Special Operations Unit.

15 Q. Okay. So the -- the uniformed deputies from
16 that unit. Is that fair?

17 A. Correct.

18 Q. And what is UBC C10?

19 A. Unincorporated Bexar County, Charlie 10 is the
20 district.

21 Q. Okay. So like an area of Bexar County?

22 A. Correct.

23 Q. And west, is that San Antonio, SATX?

24 A. Yes.

25 Q. So the SOU uniformed deputies targeted a

1 specific area of Bexar County with traffic stops and
2 pedestrian stops. Is that fair?

3 A. Yes, ma'am.

4 Q. These are the same kind of traffic stops and
5 pedestrian stops we talked about previously?

6 A. Correct.

7 Q. Okay. Congratulations. I think we're done
8 with 71. I'm going to put these away.

9 Okay. We need to set up an exhibit.

10 MS. HEBERT: Joshua, can you get the cord?
11 I want to look at an Excel document. And I'm trying to
12 avoid having to stop and take a giant break, so you
13 might just have to bear with us as we set up the
14 technology. Let's just go off the record for a minute
15 while we get this up.

16 (Discussion off the record.)

17 (Exhibit No. 75 was marked.)

18 Q. (BY MS. HEBERT) Okay. So we pulled up on the
19 big screen what is being marked as Exhibit 75. I'm
20 handing Janalyn a placeholder worksheet for that.

21 Do you know what this Excel document is?
22 Trying to make sure that all the tabs are visible. Have
23 you ever seen this before?

24 A. No.

25 Q. This is what has been labeled by Defendants as

1 BC 12116. It's an Excel spreadsheet. And I'll
2 represent to you that it was labeled video reviews. And
3 I -- what I understand it to be is video reviews from
4 specific time, like the record of it from you. Do you
5 see your name here in the "Reviewing Supervisor"
6 section?

7 A. Yes, ma'am.

8 Q. Is that you?

9 A. Yes.

10 Q. Is that your officer number?

11 A. That's my employee number.

12 Q. Employee number?

13 A. Yes, ma'am.

14 Q. And I see a series of dates here of review
15 completed. Would those be the dates that you completed
16 these reviews?

17 A. I believe so, yes.

18 Q. Okay. And I see a group of officers here in
19 the "Recorded By" section?

20 A. Yes, ma'am.

21 Q. I see four officers like here total and I'm
22 happy to, like, filter it so we can confirm that.

23 A. Yeah, I see Gereb, Hernandez, Babb, Aguillon.

24 Q. Yeah, and those are all that I see.

25 Were you the supervising officer for all

1 four of those folks in 2022?

2 A. I believe so.

3 Q. Okay.

4 A. Now, they may have -- they may have, like John
5 Aguillon --

6 Q. Sure.

7 A. -- may have been moved from special
8 enforcement. But they -- they hadn't moved him off of
9 my profile. So I would still get his videos.

10 Q. So you were still reviewing his videos even
11 though you weren't necessarily his supervisor?

12 A. Correct.

13 Q. Because the AXON system was pushing them to
14 you. Is that fair?

15 A. Correct.

16 Q. Got it. Okay. And I'm going to just try to
17 make this as easy for us as possible. I'm going select
18 the filtering option for the top rows just so we can see
19 the dates. And I see three dates here for the reviews.
20 January 10th, January 20th, June 4th, 2022; is that
21 right?

22 A. Correct.

23 Q. Okay. So there were three dates that you did,
24 like, AXON generated reviews --

25 A. Correct.

1 Q. -- in 2022?

2 A. Yes.

3 Q. Did you review other footage than what AXON
4 prompted you to review?

5 A. I may have. Yes, ma'am.

6 Q. Okay. And if you did other review, it wouldn't
7 necessarily be captured in this Excel sheet?

8 A. Correct.

9 Q. Got it. Did all four of the officers listed
10 here, even though I know you weren't supervising John
11 Aguillon at the time, did they all do traffic stops?

12 A. They could, but not necessarily.

13 Q. Okay.

14 A. For example, Richard Hernandez was, at the
15 time, was the estray.

16 Q. I didn't see that there were two Hernandezes.
17 Apologize. There's a Jonathan Hernandez and a Richard
18 Hernandez.

19 A. Yes, ma'am.

20 Q. Understood. Okay. So there's actually five
21 officers here?

22 A. Correct.

23 Q. Got it.

24 A. That I can see, yes.

25 Richard Hernandez was the estray deputy so

1 he more than likely, unless it's something egregious,
2 would not make traffic stops.

3 Q. Understood. What about Jonathan Hernandez?

4 A. Same thing. So he was the animal cruelty
5 investigator --

6 Q. Got it.

7 A. -- so more than likely would not have any
8 traffic stops.

9 Q. Understood. So mainly Deputy Babb and Deputy
10 Gereb?

11 A. Correct.

12 Q. Okay. And I guess would you say that both
13 Deputy Babb and Deputy Gereb followed the same routine
14 pattern of conducting a traffic stop?

15 A. Yes, ma'am.

16 Q. And of course there's going to be, like,
17 idiosyncratic differences --

18 A. Right.

19 Q. -- your style is maybe different than Deputy
20 Babb's style or Mr. Frigerio's style if they were
21 conducting traffic stops. But -- so I guess I just want
22 to, like, understand what the bones would be that you
23 would be looking for Deputy Gereb and Deputy Babb's
24 traffic stops generally.

25 I mean, I guess would it be fair to say

1 that you expected them to stop the driver and pull to
2 somewhere safe to have a conversation?

3 A. Yes, ma'am.

4 Q. And would you -- would it be fair to say that
5 you expected the officer to get out and introduce
6 himself and say why they were stopping --

7 A. Correct.

8 Q. -- the driver?

9 A. Yes, ma'am.

10 Q. Would it be fair to say that you would expect
11 the officer to ask, for, you know, the driver's license
12 or an ID?

13 A. Correct.

14 Q. Would it be fair to say that you would expect
15 your officers to interview, ask questions of a driver?

16 A. Yes.

17 Q. Would it be fair that you would expect the --
18 your interdiction officers, Babb and Gereb to ask the
19 driver to get out of the vehicle?

20 A. I don't expect it, but that was their way of
21 operating.

22 Q. Okay. Would it be fair to say that if they
23 asked the driver to get out of vehicle, you would expect
24 them to do a pat down?

25 A. Yes, ma'am.

1 Q. Okay. Would it be fair to say that you would
2 expect both of them to have the driver come sit in their
3 patrol vehicle?

4 A. Not expect them. But at their discretion, they
5 would.

6 Q. And that was their general practice?

7 A. Yes, ma'am.

8 Q. Okay. Would you -- would it be fair to say
9 that you expected Deputy Gereb and Deputy Babb to
10 complete the citation or warning while interviewing the
11 driver in their patrol vehicle?

12 A. Yes, ma'am.

13 Q. Okay. Would it be fair to say that you
14 expected both Deputy Gereb and Deputy Babb to ask for
15 consent to search the vehicle?

16 A. If -- if they felt that there was reasonable
17 suspicion, yes.

18 Q. Sure. And I guess, would the default be ask
19 for consent first to search if there was reasonable
20 suspicion to ask for consent first as like the let's ask
21 for consent before taking any other step?

22 A. If they did not have probable cause, they would
23 need to ask for consent.

24 Q. Okay. Got it. But even if they had probable
25 cause, wouldn't they just ask for consent because if the

1 driver consented, then you don't have to worry about
2 anything else later?

3 A. They wouldn't need to ask if they had probable
4 cause.

5 Q. Okay. Looking back at the Excel sheet, there's
6 a column, I'm going to try to expand some of these
7 columns so you can see the whole title. Just expand
8 them out, even if we have to like scroll over. Do you
9 see this column that says "Selected Criteria" at the
10 top?

11 A. Yes, ma'am.

12 Q. And I see for every row it says "no concern
13 raised."

14 Do you see that?

15 A. Yes, ma'am.

16 Q. And does that mean that for every video you
17 reviewed, at least for this 2022 batch, you didn't have
18 any concerns?

19 A. Correct.

20 Q. Okay. I want to look at the next column. And
21 I'm going to scroll down to -- there's an optional note
22 this column is titled "Optional Note." I'm going to
23 scroll down to where I see one optional note. I don't
24 see any others so far. Do you see any others?

25 A. No.

1 Q. Just one note.

2 A. Yes, ma'am.

3 Q. I'm reading "be aware of your camera
4 recording"; is that right?

5 A. Yes, ma'am.

6 Q. And I'm going to scroll over. This was on a
7 deputy recorded by Deputy Babb; is that correct?

8 A. Correct.

9 Q. What -- what were you talking about here?

10 A. Without looking at the video, I'm not sure. It
11 could have been anything.

12 Q. Okay. Sure. Okay. I think we're done with
13 that exhibit for now. We'll just leave it up in case we
14 need to use the computer so we don't have to worry about
15 it.

16 Let's look at Exhibit K. And we're going
17 to mark this Exhibit 76.

18 (Exhibit No. 76 was marked.)

19 Q. (BY MS. HEBERT) Okay. My colleague is handing
20 you what's been marked Exhibit 76. Can you take a look
21 at this and just, like, briefly flip through it. And
22 I'm going to -- let me know when you're ready.

23 MR. WINDHAM: I have at least one more copy
24 that wasn't scrambled.

25 THE WITNESS: Okay.

1 Q. (BY MS. HEBERT) Do you know what this document
2 is? Can you tell me, describe what it is?

3 A. It's a snapshot of the AXON body camera.

4 Q. Okay. So would it be fair to say, then, that
5 this exhibit, Exhibit 76, is just a series of AXON body
6 camera records?

7 A. Yes.

8 Q. Okay. Let's go to BC 12065. Okay. And I'm
9 going to look at the picture on page 12065. And in
10 the -- in the picture, I see some text, in the text of
11 the left side -- left upper side of the picture. I see
12 the date March 16th, 2022.

13 Do you see that?

14 A. Yes, ma'am.

15 Q. And I see the timestamp of 11:13 a.m.

16 Do you see that?

17 A. Yes.

18 Q. Okay. I'm going to represent to you that the
19 traffic stop of Mr. Schott took place on 3/16/2022 at
20 approximately 11:15 a.m. Does that sound right to you?

21 A. Yes, ma'am.

22 Q. Okay. Looking at the text on the right-hand
23 column of 12 -- of BC 12065 and BC 12066 and to 12067
24 and 12068 all the way to, let's see, BC 12078, it seems
25 like on that right-hand column, this is a transcript of

1 what is happening in the body camera footage. Is that
2 fair?

3 A. Yes, ma'am.

4 Q. Have you seen this before?

5 A. No.

6 Q. Have you seen, like, the ability to generate a
7 transcript from the body camera footage before?

8 A. The actual text?

9 Q. Not like this text in general. But have you
10 seen, like, the AXON software --

11 A. Yes.

12 Q. -- can generate a transcript?

13 A. Yes.

14 Q. Is that a fair understanding?

15 A. Yes.

16 Q. AXON software can generate a transcript of what
17 happened in the body camera footage?

18 A. Yes, ma'am.

19 Q. Okay. Is there -- do you know if there's a way
20 to download that transcript?

21 A. I don't know.

22 Q. Okay. Sure.

23 A. Are you talking about just the transcript
24 itself?

25 Q. Yeah. Like this -- this -- I mean, we clearly

1 have a transcript in the right margin. And it's kind of
2 hard to read as you can see. Like, obviously it's,
3 like, a very narrow and very tiny print. So do you know
4 if there's a way to download it, to say oh, generate the
5 transcript?

6 A. Only -- yeah, no, I don't.

7 Q. Okay. Can we look -- flipping through the
8 pages here --

9 A. If I -- if wanted to.

10 Q. Sure.

11 A. I would probably highlight everything
12 transcribed and put it on to another Word document,
13 blank, to maybe help me read it if -- if I had that
14 trouble.

15 Q. Go it. You'd copy and paste it into a Word
16 document?

17 A. Yeah.

18 Q. Understood. Thank you.

19 So I want to look at generally from page
20 160 -- 1265 to -- all the way to 12083. Do these pages
21 reflect records from the body camera footage of Deputy
22 Babb on -- at the traffic stop of Mr. Schott?

23 A. Let me check. Well, it goes to page 12081,
24 No. 18, I believe. Because then it changes to
25 April 12th.

1 Q. To page No. 18. Okay. I see -- I see where
2 you're looking at. Page 12081.

3 A. Yes, ma'am.

4 Q. Let's just go there. So I see you're looking
5 at row 18 on BC 12081. Is that fair?

6 A. Yes, ma'am.

7 Q. So what does this row reflect?

8 A. The -- I would say, the date of the incident.

9 Q. This is a --

10 A. No, I'm sorry. It's -- so it would be
11 different.

12 Q. So I see a date of March 18th, 2022?

13 A. Yes, ma'am.

14 Q. And in the user column, I see Deputy Babb. Is
15 that fair?

16 A. Yes, ma'am.

17 Q. Okay. And then, I think let's go to the
18 "Activity" section. Do you see "Evidence Record
19 Streamed"?

20 A. Yes.

21 Q. Okay. And so --

22 A. Accessed. "Evidence Record Accessed."

23 Q. Oh, I was looking at row 18. But if you're --
24 are you looking at row 16 then?

25 A. Oh, sorry. I was -- yeah. I see where you're

1 at now.

2 Q. Now I see where you are. Let's look at row 16.

3 Row 16, the date on row 16 is what?

4 A. The date is 18 March 2022.

5 Q. The user is who?

6 A. Babb, Deputy Babb.

7 Q. And the activity is what?

8 A. Evidence record accessed.

9 Q. Okay. So I'm going to flip back to page 12080.
10 And let's look at the -- the title here looks like
11 "Evidence Audit Trail." Am I reading that right?

12 A. Oh, yes, ma'am.

13 Q. And I see the record start date is March 16th,
14 2022, 11:13. Am I reading that right? It's a -- a row
15 kind of on the left side, I see record start.

16 A. Okay.

17 Q. Do you see that March 16th, 2022, 11:13?

18 A. Yes, ma'am.

19 Q. And the next row is uploaded 16th March 2022,
20 1504?

21 A. Yes, ma'am.

22 Q. Uploader, I see Deputy Babb; is that correct?

23 A. Yes, ma'am.

24 Q. So it's my understanding based on this record
25 of BC 1280 and then the subsequent pages, this is the

1 evidence audit trail for Deputy Babb's body camera from
2 March 16th, 2022. Is that fair?

3 A. Yes, ma'am.

4 Q. And this would be some of the body camera
5 footage from Deputy Babb; is that right?

6 A. Correct.

7 Q. And so do the next couple of pages each of the
8 rows reflect access to or what happened with that body
9 camera footage?

10 A. Yes, ma'am.

11 Q. Okay. So it looks like -- let's just start
12 with row 1. It looks like that's the -- the date on
13 that is March 16, 2022?

14 A. Yes, ma'am.

15 Q. And the time is 1500 hours 04 minutes. So that
16 would have been what, 3:00 p.m.?

17 A. Yes, ma'am. 3:04 p.m.

18 Q. And that's when the evidence record was
19 created. Is that fair?

20 A. Yes, ma'am.

21 Q. And then I see the next line of activity,
22 "Retention Level Updated"; is that right?

23 A. Retention level updated.

24 Q. In the activity row, the activity column?

25 A. Oh, yes, ma'am.

1 Q. So it seems like the next -- all of these rows
2 that kind of follow it, at least for the initial part,
3 are all March 16th, 2022 and it seems to me that they
4 reflect the body camera footage being added to the
5 system. Is that fair?

6 A. Yes, ma'am.

7 Q. Okay. Then let's flip to the next page. And
8 again on the next page, I see in row 13, I see the date
9 is different.

10 Do you see that?

11 A. Correct. Yes, ma'am.

12 Q. And that's two days later, after the stop. Is
13 that fair?

14 A. Yes, ma'am.

15 Q. March 18th, 2022?

16 A. Yes, ma'am.

17 Q. And the user here is Deputy Babb; is that
18 right?

19 A. Yes, ma'am.

20 Q. And the activity is the evidence record was
21 accessed.

22 A. Yes, ma'am.

23 Q. So does that mean on March 18th, 2022 p.m. at
24 the time here, 3:12 p.m., Deputy Babb accessed his body
25 camera footage?

1 A. Yes, ma'am.

2 Q. And it looks like the next few rows, up until
3 row 18, are all about Deputy Babb accessing and
4 streaming his body camera footage on March 18, 2022?

5 A. Yes, ma'am.

6 Q. Okay. The next date that I see is row 19 with
7 April 12th, 2022.

8 Do you see that?

9 A. Yes, ma'am.

10 Q. And the user there is Lieutenant Ortega --
11 Lieutenant Marta Ortega?

12 A. It's -- LE is law enforcement Sergeant Ortega.

13 Q. Oh, excuse me. Yeah, thank you for correcting
14 me. Sorry. Sergeant Marta Ortega accessed the body
15 camera footage on April 12th, 22; is that right?

16 A. Correct.

17 Q. And she was the -- at this time -- okay, I'd
18 just like to put a bow on it. Sergeant Marta Ortega
19 previously was Sergeant Marta Rodriguez; is that right?

20 A. Correct.

21 Q. Okay. So Sergeant Marta Ortega accessed and
22 reviewed, it looks like, the body camera footage in all
23 of those rows from 19 through 21 are her accessing it
24 and reviewing that footage. Is that fair?

25 A. Yes, ma'am.

1 Q. On April 12th, 2022?

2 A. Yes, ma'am.

3 Q. And it looks like the next one is row 22, also
4 April 12th, 2022; is that right?

5 A. Yes, ma'am.

6 Q. And the date on that is -- or the time on that,
7 excuse me, is 12:38 p.m.; is that right?

8 A. Yes, ma'am.

9 Q. And it seems like the next user is you.

10 A. Correct.

11 Q. Is that fair?

12 A. Yes, ma'am.

13 Q. So did you access and review Deputy Babb's body
14 camera footage on April 12th, 2022?

15 A. I would have, yes, ma'am.

16 Q. Okay. It seems like that is generally like
17 the -- the same time frame around in the 12 o'clock hour
18 you accessing until you get to row 28. And then it
19 seems like row 29, you accessed the body camera or
20 watched the body camera again at 1700 hours on
21 April 12th. Is that fair?

22 A. Yes.

23 Q. And you watched the body camera footage in some
24 capacity or another until -- all during the 1700 hour
25 which is what, 6:00 p.m.?

1 A. 5:00.

2 Q. 5:00 p.m. Thank you. Sorry, I'm not good at
3 the 24-hour clock. The 5:00 p.m. hour.

4 I want to look at then row 34. It looks
5 like on April 18th someone else accessed the body camera
6 footage?

7 A. Yes, ma'am.

8 Q. I see --

9 A. Detention.

10 Q. -- Detention Lieutenant Castillo?

11 A. Yes, ma'am.

12 Q. Who is Detention Lieutenant Castillo?

13 A. I believe she was assigned to maybe open
14 records at the time.

15 Q. Okay. So this is maybe the open records
16 request access?

17 A. Correct.

18 Q. Got it. That's helpful.

19 So it looks like she accessed it until
20 row -- and her entries are until row 43, is that fair,
21 on page 12082?

22 A. Yes, ma'am.

23 Q. And then at row 44, it looks like Sergeant
24 Marta Ortega accessed the body camera footage again; is
25 that correct?

1 A. Yes, ma'am.

2 Q. And, again, Marta Ortega's entries run to row
3 54, and I see two dates; May 16th and May 17th. Is that
4 fair?

5 A. Yes.

6 Q. And then row 55, it looks like Lieutenant
7 Castillo accessed it again; is that right?

8 A. Yes, ma'am.

9 Q. And then -- we'll continue -- let's look at row
10 58.

11 A. Okay.

12 Q. I see the date of October 2022, October 7th of
13 2022?

14 A. Yes, ma'am.

15 Q. And I see that the user for these last three
16 entries is Deputy Ross Garza.

17 Do you see that?

18 A. Yes, ma'am.

19 Q. Who's Deputy Ross Garza?

20 A. He's a training academy instructor.

21 Q. Okay. So Exhibit 58 through 60, a training
22 academy instructor accessed and streamed Deputy Babb's
23 body worn camera footage from Alek Schott's stop?

24 A. Correct.

25 Q. I think my computer just went to sleep or

1 something. Can you help me bring that back on. Don't
2 know why. Don't look. Don't even remember my password
3 sometimes. Sorry about that. Went to sleep. I don't
4 know if we need it, but I want it there.

5 Can we look back at BC 12083? These last
6 three rows with Deputy Garza, you mentioned he was with
7 the training academy at the time?

8 A. Correct.

9 Q. Why would he be accessing Deputy Babb's body
10 worn camera footage?

11 A. I -- I don't know.

12 Q. Okay.

13 A. Now, they do have the ability for training to
14 access body camera footage. But I'm not sure why, if
15 that's what he was using it for or if open records
16 requested him to look at it and see if anything stuck
17 out.

18 Q. Sure.

19 A. That he wanted to, you know, let them know
20 about. So no idea.

21 Q. Sure. Thanks.

22 Okay. I think we can put that to the side
23 for now.

24 MS. HEBERT: Let's -- let's get out Exhibit
25 O, Mr. Windham.

1 Q. (BY MS. HEBERT) And I'll just ask you a couple
2 questions before we hand that out.

3 During your first deposition, we talked
4 about how the criminal interdiction deputy assignment
5 was categorized as temporary assignment. Do you
6 remember that?

7 A. Yes.

8 Q. And you mention that the orders assigning
9 officers to the criminal interdiction unit would have
10 had an indication that the assignment was temporary?

11 A. Correct.

12 Q. I want to look at some of those orders just so
13 that I understand what I'm looking at because I don't
14 necessarily always understand what the -- what the text
15 is.

16 A. Sure. 76.

17 MR. WINDHAM: Exhibit 77.

18 (Exhibit No. 77 was marked.)

19 Q. (BY MS. HEBERT) Take a second to review this.
20 Let me know when you're ready.

21 A. Okay.

22 Q. Is this the order assigning Deputy Gereb to you
23 for work in the criminal interdiction unit in July of
24 2020?

25 A. Yes, ma'am.

1 Q. Okay. And I don't see the language criminal
2 interdiction unit anywhere on here. Is that fair?

3 A. No, yeah, you're right.

4 Q. And why? Why not?

5 A. I believe because it was just a pilot program,
6 I'm going to assume.

7 Q. Sure. But I don't see the word pilot program
8 on here either?

9 A. Correct.

10 Q. Okay. And --

11 A. Oh, I'm sorry. (Reading:) Reassigned to
12 Administration Support Bureau, Strategic Operations
13 Crime Interdiction Unit.

14 Q. Oh, yeah, you're right. Thank you. This is
15 why I'm asking you these questions about it. Okay.

16 And I do see -- and I didn't realize this
17 now, like, I am learning this with you. It seems like
18 the reassignment is temporary in accordance with the
19 provision of the rules of Bexar County. And there's a
20 bunch of other sentences. Is that what you're referring
21 to?

22 A. Yes, ma'am.

23 Q. Are there rules in the Civil Service
24 Commissioning and Bargaining Agreement here that deal
25 with the temporary assignment, or are they just -- is

1 there just like, the reassignment is temporary, and then
2 these are the general rules that apply to all positions?

3 A. Correct. Yes, ma'am.

4 Q. Okay. That's helpful. I think that's all we
5 need to do with that. So you can put that to the side.

6 A. Okay.

7 MS. HEBERT: Let's look at Exhibit N,
8 Mr. Windham. And this would be Exhibit 78.

9 (Exhibit No. 78 was marked.)

10 Q. (BY MS. HEBERT) Do you mind taking a look at
11 this one as well?

12 A. Sure.

13 Q. Let me know when you're ready.

14 A. Yes, ma'am.

15 Q. Okay. The date on this document is April 30th,
16 2021. Is that fair?

17 A. Yes, ma'am.

18 Q. And, again, I think it governs Deputy Gereb; is
19 that correct?

20 A. Correct.

21 Q. And I'm not entirely sure what's going on here,
22 so help me out, explain. It looks like Deputy Gereb is
23 being reassigned to the Admin and Support Division
24 Special Enforcement Unit from the Law Enforcement
25 Bureau. So can you explain to me, like, what happened?

1 A. So there was a time during this period where
2 Deputy Gereb was transferred back to patrol for
3 personnel shortages --

4 Q. Sure.

5 A. -- and then brought back over.

6 Q. Okay. So is this the reassignment then to
7 him -- of him to you?

8 A. Again, yes, ma'am.

9 Q. Okay. And so I see instructions, (Reading:)
10 You are to report to Sergeant Pedro Gamboa, is -- so on
11 April 30th, 2021, Deputy Gereb was assigned back to
12 criminal interdiction. Is that fair?

13 A. Correct.

14 Q. Okay. And comparing this exhibit, Exhibit 78
15 with Exhibit 77.

16 A. Yes, ma'am.

17 Q. If we look at the -- this reassignment section,
18 it seems like the word "temporary" is no longer a part
19 of this version of the order. Is that fair?

20 A. Correct.

21 Q. So the reassignment when Deputy Gereb was
22 reassigned back to you in August -- or April 30th, 2021,
23 the assignment was no longer listed as temporary?

24 A. Correct.

25 MS. HEBERT: Okay. I want to look at

1 another exhibit, Mr. Windham.

2 THE WITNESS: We're done with this one?

3 MS. HEBERT: Yeah, you can put that one to
4 the side. Exhibit M.

5 (Exhibit No. 79 was marked.)

6 Q. (BY MS. HEBERT) My colleague is handing you
7 what's been marked Exhibit 79. Sergeant Gamboa, what is
8 this document?

9 A. It's a transfer order for Deputy Babb.

10 Q. Okay. And I see special enforcement unit is
11 the assignment and I see your name, (Reading:)
12 Instructions: You are to report to Sergeant Pedro
13 Gamboa.

14 Do you see that?

15 A. Yes, ma'am.

16 Q. Is this the assignment the order assigning
17 Deputy Babb to the criminal interdiction unit?

18 A. Correct.

19 Q. Okay. And I don't see "temporary" on this
20 order either. Is that fair?

21 A. Yes, ma'am.

22 Q. So the assignment of Deputy Babb to the
23 criminal interdiction unit was not listed as temporary?

24 A. Correct.

25 Q. Okay. I want to watch a couple videos, so

1 you're going to have to bear with me as I figure -- as I
2 navigate that. Hold on, because this is going to take
3 me a couple minutes.

4 MR. WINDHAM: Do you want to go off the
5 record?

6 MS. HEBERT: Yeah, do you mind just taking
7 a quick pause. Unless anybody needs a break, we won't
8 take a break.

9 (Brief recess.)

10 Q. (BY MS. HEBERT) So we're back on the record
11 after now we got the tech set up. I'm going to
12 introduce an exhibit. This exhibit was produced as BC
13 1084. Okay. Didn't work. Hold on one second. We just
14 had a technology issue pop up. I don't know what's
15 going on. Hold on, please. We might have to take a
16 longer break. Something's not right. Let's go off the
17 record and I'll try to figure out what's going on.

18 (Brief recess.)

19 Q. (BY MS. HEBERT) Okay, we're back on the
20 record.

21 We're going to hand you what is being
22 marked exhibit -- we're going to play what's being
23 marked Exhibit 80. I'm handing Janalyn the place holder
24 sheet for Exhibit No. 80.

25 (Exhibit No. 80 was marked.)

1 Q. (BY MS. HEBERT) Just so everybody is aware,
2 this is BC 10842. We're going to watch part of the
3 video here. You're welcome to watch the entire thing.
4 We can take another break and you can catch the whole
5 thing. But I'm -- as I said before, I'm going to try to
6 focus on, like, specific parts. So we're not watching
7 the whole 57 minutes.

8 A. Sure.

9 Q. I'm going to summarize to you what happened in
10 like, the first 11 minutes here. Deputy Gereb stopped a
11 car that had been going 107 miles per hour on the
12 highway, driving recklessly. The driver was a young
13 male, late teens to early 20s. There were two teenage
14 girls in the car with him that he has sit over the side
15 and they're getting picked up by their parents. We're
16 going to watch the part where Deputy Gereb starts to
17 search the car.

18 A. Okay.

19 Q. Okay. And I'm going to play from minute -- 11
20 minutes and 9 seconds to 11 minutes and 23 seconds.

21 A. And just for the sake -- was there a pursuit?

22 Q. There was not a pursuit. I don't think so.
23 Not what I saw on the body camera footage and Deputy
24 Gereb doesn't really say anything about, like, a
25 pursuit.

1 A. Okay.

2 Q. And the date on this body camera footage is
3 3/10/2022.

4 A. Okay.

5 Q. I'm going to play from 11:09 to 11:23.

6 (Video playing.)

7 Q. (BY MS. HEBERT) I stopped at 11:24. Sorry. A
8 little longer. I saw Deputy Gereb there. I heard his
9 voice begin to search a vehicle, looks like he found
10 illegal narcotics in the car. Is that fair?

11 A. Yes, ma'am.

12 Q. I'm going to watch. I'm going to skip ahead to
13 another point. I'm going to watch 13-something. Let's
14 skip to 13:19 to 14:10. So we'll watch about a minute.

15 (Video playing.)

16 Q. (BY MS. HEBERT) Okay. We stopped at 14:12.
17 And what I understood just happened in the clip was
18 Deputy Gereb and Deputy Babb were having a conversation
19 at the traffic stop. Is that fair?

20 A. Yes, ma'am.

21 Q. And seems like Deputy Gereb had concluded that
22 the driver was a drug dealer. Is that fair?

23 THE REPORTER: Is what?

24 MS. HEBERT: A drug dealer.

25 MR. FRIGERIO: Objection, form.

1 Q. (BY MS. HEBERT) We can go back and watch what
2 we just watched. We'll watch -- we'll go back to 3:19.
3 I think -- no offense, Mr. Windham, he sneezed during
4 the part.

5 MR. WINDHAM: Apologies. I have a knack
6 for timing.

7 MS. HEBERT: We'll watch from 3:19 forward
8 and watch it again. So 3:19. I'll stop it in a minute.

9 (Video playing.)

10 Q. (BY MS. HEBERT) Okay. Did you hear a
11 conversation between Deputy Babb and Deputy Gereb on
12 that clip?

13 A. Yes.

14 Q. Did Deputy Gereb say that the driver was going
15 down for dealing?

16 A. Yes.

17 Q. Okay. Based on the evidence that Deputy Gereb
18 found in the vehicle?

19 A. Yes, ma'am.

20 Q. Okay. I'm going to watch from -- or play from
21 3:37:20. So we're going to try to get to 3:37:20. Come
22 on. So we're going to start -- I'm going to play 37:20
23 to about 38.

24 A. Okay.

25 MS. HEBERT: It might have frozen. Yep,

1 that's the freezing that I'm talking about. Can we
2 switch to yours?

3 MR. WINDHAM: Sure.

4 Q. (BY MS. HEBERT) Sometimes, I don't know why it
5 does this, it freezes when I try to skip, like, large
6 sections of the video.

7 A. I see.

8 Q. We're going to mark this for the record as
9 Exhibit 80A, and we'll produce both videos. They're the
10 same file but different -- different sources and so I
11 want to make sure that it's clear that Defendants have
12 access to both videos that were played and, you know,
13 there's no one -- no one is trying to trick anybody
14 here.

15 MR. WINDHAM: How do you want to do this,
16 hand you my laptop or plug it in?

17 MS. HEBERT: Can we hand it to you?

18 MR. WINDHAM: Sure.

19 MS. HEBERT: Or we can try it -- let's try
20 plugging it in. Let's just try it.

21 MR. WINDHAM: Sure.

22 MS. HEBERT: And I will -- if it doesn't
23 work, it doesn't work.

24 MR. WINDHAM: Sure.

25 (Exhibit No. 80A was marked.)

1 Q. (BY MS. HEBERT) Same video. We're marking
2 this video as 80A, just so that there's consistency.
3 Let's go to 37:20. Are you there? We're going to play
4 to approximately 38 minutes.

5 (Video playing.)

6 Q. (BY MS. HEBERT) Okay. In the clip that we
7 just watched from 37:20 to 38, seemed like Deputy Gereb
8 was counting money that he found in the driver's
9 vehicle. Is that fair?

10 A. Yes, ma'am.

11 Q. Okay. And I heard Deputy Gereb say "I'll talk
12 to the sarge, see if he want me to take the money." Did
13 you hear that?

14 A. Yes.

15 Q. Okay. Would the sarge be you?

16 A. Yes.

17 Q. Okay. When criminal interdiction officers
18 found cash in a vehicle, did you expect them to call
19 you?

20 A. Yes.

21 Q. Why?

22 A. Just if it meets the criteria for asset
23 forfeiture.

24 Q. Okay. And what is the criteria for asset
25 forfeiture?

1 A. Minimum \$1500.

2 Q. Okay. Why would the amount matter?

3 A. Because 1500 and it being money obtained
4 through the illicit criminal activity would be another
5 charge, which would be the money laundering charge.
6 Anything under that, I -- I could approve to still take
7 the money and place it for evidence as money obtained
8 from the illicit drug sales.

9 Q. Okay. Got it. That's helpful. I think that
10 we're done with that exhibit.

11 MS. HEBERT: Josh, I'm going to hand you
12 this flash drive. You can plug it into your computer?

13 MR. WINDHAM: You want me to unplug this?

14 MS. HEBERT: Oh, just turn it off for now.
15 And we'll plug that in so -- there's a document I want
16 to show. I think this is the version. Just plug it in.
17 And the Excel file right there.

18 I don't have place holder for you for this
19 one. My apologies. And what number are we on?

20 THE REPORTER: 81.

21 MR. WINDHAM: It will be 81.

22 (Exhibit No. 81 was marked.)

23 Q. (BY MS. HEBERT) Okay. I am showing you BC
24 16571. I'm going to scroll up to the top here. We are
25 marking this as Exhibit 81. We'll provide a copy to the

1 court reporter.

2 Do you know what this document is?

3 A. That's the Criminal Interdiction Unit Activity
4 Sheet.

5 Q. Okay. And I see the date of July 1st, 2020 to
6 October 19th, 2020 on the document. What is that
7 talking about?

8 A. The dates provided, I believe, for -- for this
9 document.

10 Q. Okay. And I see badge No. 401. Do you know
11 who badge 401 is?

12 A. That would be the sheriff.

13 Q. Okay. So that's the sheriff's badge. Thank
14 you. That's helpful.

15 And I see a bunch of data. Looks like
16 consent and probable cause searches in the officer
17 initiated activity. Am I reading that right?

18 A. Yes, ma'am.

19 Q. And I see a number of traffic stops, 214.
20 Would that be the number of the traffic stops that the
21 interdiction team did probably in this time period?

22 A. Probably. Yes, ma'am.

23 Q. Okay. I want to look at this number here.
24 "Currency recovered" I see the number \$456,937. Seems
25 like a lot of currency recovered for a couple months?

1 A. I think that's a typo.

2 Q. Who -- where would the typo be?

3 A. That -- that number.

4 Q. Okay. What would you expect the number to be?

5 A. I would have known if we had recovered that
6 much money.

7 Q. So you didn't recover that much money, to your
8 knowledge?

9 A. Right.

10 Q. Cool. What would you -- where would you expect
11 the number to be? Where would the range generally be?

12 A. I mean, it just depends. I mean, that's a
13 significant amount. So I don't remember at any point
14 that we'd have that much in currency recovered.

15 Q. Sure.

16 A. Now with our -- now with the TAG, we did
17 recover in a case \$608,000.

18 Q. \$608,000? Okay.

19 A. So I don't -- but, again, I don't know if they
20 use that money or if that's the sheriff making this --
21 filling out this activity sheet for those dates. I'm
22 not sure where that money would come from.

23 Q. So have you ever seen this document before?

24 A. This one specifically, no.

25 Q. Okay. That's okay. So you haven't seen this

1 document before and you don't know who filled it out?

2 A. Correct.

3 Q. What's the most the criminal interdiction unit
4 ever recovered?

5 A. If I can remember, it was probably less than
6 10,000.

7 Q. Okay.

8 A. At any specific time.

9 Q. And the minimum would have been zero?

10 A. Right.

11 Q. So somewhere between zero and 10K is the
12 general recovery for the criminal interdiction unit if
13 they found currency?

14 A. Right.

15 Q. Okay. Do you know what the -- I know that --
16 let me back up. I know the criminal interdiction unit
17 officially ran from 2019 to sometime in 2023. Is that
18 fair?

19 A. Correct.

20 Q. Do you know what the total amount the criminal
21 interdiction recovered would be?

22 A. I don't.

23 Q. Okay. Do you -- did you have any yearly totals
24 on what the criminal interdiction unit recovered?

25 A. I'm sure there was. I just -- I just don't

1 know the amount.

2 Q. Sure. And did you compile those statistics?

3 A. I would have.

4 Q. Okay. So somewhere in your files or at the
5 county's files, there should be a total amount recovered
6 per year?

7 A. Right.

8 Q. Okay. Thank you. I have -- we just got some
9 of these documents yesterday so I haven't, like, read
10 all of them so I'll just be a hundred percent
11 transparent with you. There's one document that I want
12 to ask you about.

13 A. Sure.

14 Q. I don't -- I haven't read it. I just want to
15 ask what it was used for --

16 A. Sure.

17 Q. -- if that's okay?

18 MS. HEBERT: Let's turn this off for a
19 second so I can navigate through Mr. Windham's computer.
20 Wrong one. Sorry. I know I'm just, like, taking over
21 your computer without much notice.

22 They are labeled. Sorry, Charles.

23 Q. (BY MS. HEBERT) Okay. I'm showing you what is
24 BC 16581. We're going to mark this electronically as
25 Exhibit --

1 MS. HEBERT: What number are we on,
2 Mr. Windham?

3 MR. WINDHAM: 82.

4 MS. HEBERT: 82. So this is Exhibit 82.
5 We do not have a place holder.

6 (Exhibit No. 82 was marked.)

7 MS. HEBERT: But we'll provide you an
8 electronic copy to add to the file.

9 Q. (BY MS. HEBERT) Sergeant Gamboa, have you ever
10 seen this before?

11 A. Not that I can recall.

12 Q. I see your name is on the first page, Sergeant
13 Pete Gamboa. Why would your name be on the first page?

14 A. Because I was part of the unit.

15 Q. Okay. Do you know who gave this presentation?

16 A. It could have been both Deputy Louie Estrada
17 and Deputy Gereb. I don't know if -- so at one time
18 they were helping the Explorer program.

19 Q. The, like, youth program for the sheriff's
20 office?

21 A. Yes. Yes. So I'm not sure if this
22 presentation was for that. But they would probably
23 know.

24 Q. You didn't give this presentation?

25 A. No.

1 Q. Okay. That's it. That's all I want to ask
2 about that one.

3 A. Okay.

4 Q. I just didn't realize.

5 A. So I believe that -- that narcotics was the
6 recovery from Max and Deputy Molina when, remember I
7 talked about that -- the dog -- the team is so good in
8 training that he smelled the narcotics through the gas.

9 Q. Sure.

10 A. That's what --

11 Q. That's where that is from?

12 A. Yeah.

13 Q. They cleaned it up?

14 A. Yeah.

15 Q. And took the gas off of it?

16 A. Okay.

17 Q. Okay. I think we can turn off the screen
18 hopefully and not come back to it. I want to ask a
19 couple more questions and then cut you loose, hopefully.

20 A. Okay. Sure.

21 Q. So we've talked about previously the -- I don't
22 expect you to remember this date, so I'll just keep
23 reminding you on it. The traffic stop with Mr. Schott
24 happened on March 16th, 2022. We've talked about that a
25 couple of times. Mr. Schott called and complained on

1 March 18th, 2022. And during your last deposition, we
2 talked about how you spoke with Mr. Schott on
3 April 12th, '22. Do you remember that?

4 A. Yes.

5 Q. Okay. Do those dates generally sound right to
6 you?

7 A. Yes, ma'am.

8 Q. Okay. And after you spoke with Mr. Schott on
9 April 12th, 2022, did you think that Mr. Schott was
10 going to file a lawsuit?

11 A. No.

12 Q. Did you think there was a possibility he might?

13 A. No.

14 Q. Okay. Mr. Schott filed this lawsuit on
15 June 1st of 2023. How did you learn about it?

16 A. I believe it was through Captain Von Muldau.

17 Q. Okay. So the captain notified you in some way?

18 A. Yes, ma'am.

19 Q. And what did -- what did you learn from Captain
20 Muldau?

21 A. Just that Mr. Schott had filed the case in
22 federal court.

23 Q. Okay. Anything else?

24 A. That was pretty much it.

25 Q. Sure. Did Captain von Muldau give you any

1 instructions as part of...

2 A. So the only thing that he had asked was about
3 the auditing of -- through Vigilant for Mr. Schott's
4 license plate.

5 Q. Okay. So Captain von Muldau asked about the
6 Vigilant license plate reader records from Mr. Schott's
7 stop?

8 A. Correct.

9 Q. And what did you -- did you give him records?
10 Like, what happened in that situation?

11 A. I -- I believe that I had advised him that we'd
12 have to go through Vigilant to navigate that and obtain
13 those records.

14 Q. Okay. Anything else? Did you guys talk about
15 anything else?

16 A. Nothing that sticks out.

17 Q. Sure. Did Captain von Muldau give you any
18 instructions to make sure videos were saved?

19 A. No, because he controls that. I wouldn't
20 control that.

21 Q. Understood. Did Captain von Muldau give you
22 any instructions to make sure emails were saved?

23 A. No.

24 Q. Okay. And did Captain von Muldau give you any
25 instructions to make sure text messages or call logs

1 were saved?

2 A. No.

3 Q. Did anyone from the county give you
4 instructions on how to save call logs or text messages?

5 A. No.

6 Q. Is it your practice, generally, to save call
7 logs or text messages from your county phone?

8 A. Yeah, I don't delete them.

9 Q. Yeah. Okay. So you don't delete them. But
10 do -- do you affirmatively save them anywhere? So you
11 just generally try not to delete them?

12 A. Yeah.

13 Q. You've got to remember to say yes for the
14 record.

15 A. Yes. I'm sorry. Thank you.

16 Q. That's okay. That's -- and I'll just repeat
17 that, because I don't think it got captured. What is
18 your practice with call logs and text messages?

19 A. I -- I keep them. I don't delete them. I
20 don't erase them.

21 Q. And do you save them anywhere?

22 A. No, ma'am.

23 Q. Okay. And to your knowledge, did the county
24 take any steps to make sure that call logs and text
25 messages were saved from your county phone or the county

1 phones of officers who were involved in the stops or any
2 other -- involved in the stop of Mr. Schott or any other
3 phones, to your knowledge?

4 A. I do -- I do not know. I just know that our
5 phones were taken from us so that way they can be
6 dumped.

7 Q. And that was part of this lawsuit. Is that
8 fair?

9 A. Correct.

10 Q. Before the court ordered your phones to be
11 examined, did the county take your phones to take data?

12 A. No.

13 Q. I want to look at Exhibit L and we'll mark this
14 Exhibit 83.

15 (Exhibit No. 83 was marked.)

16 Q. (BY MS. HEBERT) Okay. I'm going to represent
17 that this is the forensic examination report that the
18 county produced following examination of your county
19 phone. I understand that you recently provided your
20 personal phone for examination, but we don't have the
21 results of that examination yet. So this report, as far
22 as I understand it, is for your county phone only. I
23 just want to make that clear.

24 A. Okay.

25 Q. And I don't expect you to read the whole thing,

1 it's kind of 14 pages of stuff. But I do want to flip
2 to page 11. Let me know when you get there.

3 A. Okay.

4 Q. Do you see there's like a dark blue box. It
5 says "Analysis of Evidence Item" and then a number?

6 A. Yes, ma'am.

7 Q. Do you see below that, is that your name?

8 A. It is.

9 Q. Okay. I'm going to represent to you this is
10 the examiner's findings from your -- your phone. Did
11 you have an Apple iPhone 12 from the county?

12 A. Yes, ma'am.

13 Q. Okay. And at -- let's skip to the "Messaging
14 Apps" section. And I see the second paragraph. Can I
15 read that to you?

16 A. Sure.

17 Q. (Reading:) At the time of examination, message
18 retention for iMessage was set to "Forever."

19 Did I read that correctly?

20 A. Yes.

21 Q. And is that consistent with what you just told
22 me your practice was. You don't -- you try not to
23 delete messages and you set the retention to -- to
24 forever. Is that fair?

25 A. Yes.

1 Q. Okay. I want to look down to the next like
2 blue, light blue paragraph section. Do you see the
3 header says "3/16/2022 BCSO Communication"?

4 A. Yes.

5 Q. And there are only -- I'm going to read the
6 text there. (Reading:) The only communication items
7 for that date are two calendar entries or that date one
8 is labeled "TVTP grant review" and the other is for
9 Saint Patrick's Day. Is that fair?

10 A. Yes.

11 Q. And then I want to look at the next section,
12 "3/16/2022 All Calls."

13 Do you see that?

14 A. Yes.

15 Q. And I see there are no call log entries for
16 this date; is that right?

17 A. Correct.

18 Q. Okay. And I want to skip to the next page,
19 page 12. And I want to look at deleted items. Do you
20 see that header?

21 A. Yes.

22 Q. The first paragraph says, I'm going to read
23 that to you, (Reading:) The call logs would have
24 contained 14,296 entries if none were deleted. At the
25 time of examination there were 2,082 entries. There are

1 no entries at all prior to 1/25/2003.

2 Did I read that right?

3 A. Yes.

4 MR. WINDHAM: 2023.

5 MS. HEBERT: 2023, thank you. Got to keep
6 me honest here.

7 Q. (BY MS. HEBERT) I'm going to just do the math
8 for you.

9 A. Sure.

10 Q. Unless you want to do it. Sergeant Gamboa, do
11 you want to plug into the calculator?

12 A. No, I don't care. Yeah.

13 Q. Okay. I'm going to do 14 -- 14296 minus 2082.
14 So I get that 12,214 call logs were missing. Is that
15 fair based on those numbers?

16 MR. FRIGERIO: Objection, form.

17 THE WITNESS: Sure.

18 Q. (BY MS. HEBERT) What happened to those call
19 log entries, to your knowledge?

20 A. So it may be because they changed my phone out
21 from previous. And they --

22 Q. Do you know when your phone was changed out?

23 A. I don't remember exactly when, but I believe it
24 was during -- probably during this time in January
25 of '23.

1 Q. Okay. So sometime in January of '23 --

2 A. I got a new phone.

3 Q. -- do you remember you got a new county phone?

4 A. Correct.

5 Q. And did you attempt to transfer all the data
6 from your old county phone to your new county phone?

7 A. So it -- it was done by, I believe, it was AT&T
8 that did it.

9 Q. Okay. So when you get a new phone from the
10 county, what happens?

11 A. So we'll give -- and I don't remember ever
12 using anybody but AT&T, so we'll hand them the old
13 phone. They'll transfer the -- they'll connect the two
14 phones. They'll transfer the data over. And then when
15 it's done transferring, they give us the new phone.

16 Q. Okay. So somehow, AT&T is supposed to be doing
17 the transfer?

18 A. Correct.

19 Q. Okay. Do you know if there is a back up
20 somewhere of your data?

21 A. I don't know.

22 Q. Sure. And during the -- the time we're talking
23 about, let's say 2022 to 2024, '25, just 2024, was AT&T
24 the only provider for Bexar County, to your knowledge?

25 A. Yes, ma'am.

1 Q. Okay. Do you know who the provider is for your
2 personal cell phone?

3 A. AT&T.

4 Q. So you use both -- AT&T for both of them.

5 Just say yes, for the record.

6 A. Yes. Sorry.

7 Q. It's okay. It's natural to start nodding.

8 Do you have a backup of your personal
9 phone?

10 A. I don't know.

11 Q. It's okay. Let's look back at page 12 of
12 exhibit -- what exhibit number is this?

13 MR. WINDHAM: 83.

14 MS. HEBERT: 83.

15 Q. (BY MS. HEBERT) Let's look back at page 12.
16 Would you mind looking at the second paragraph in
17 "Deleted Items."

18 A. Sure.

19 Q. I'll read that to you. (Reading:) The
20 iMessages are stored in a database filed called
21 'sms.db'. There would've been 78,201 message entries if
22 none were deleted. At the time of examination there
23 were 77,518 messages. There were no messages prior to
24 8/4/2022.

25 Did I get that right?

1 A. Yes.

2 Q. Okay. What would have happened to any text
3 messages before 8/4/2022?

4 A. No idea.

5 Q. Okay. To your knowledge, is there any way to
6 obtain the missing text messages and missing call logs
7 that would have been on your phone prior to 8/4/2022 and
8 1/25/2023?

9 A. I don't -- I don't know of any other way or
10 where that would be.

11 Q. Sure. That's fine. And I think you can put
12 this away. I think we're done with that.

13 I just have a couple of, I think follow-up
14 questions.

15 A. Sure.

16 Q. Both Deputy Gereb and Deputy Babb did a fair
17 amount of traffic stops, and you know, fair is in the
18 eye of the beholder, more than one traffic stop during
19 their time as a criminal interdiction deputy. Fair?

20 A. Yes, ma'am.

21 Q. Probably more than 50. Is that fair?

22 A. Yes, ma'am.

23 Q. Would you say more than -- probably more than a
24 hundred?

25 A. I would say yes.

1 Q. Okay. And, you know, I'm not looking to pin
2 you down on the number of traffic stops. So more than a
3 hundred traffic stops at least?

4 A. Yes, ma'am.

5 Q. With more than a hundred traffic stops, I
6 understand that success looks like coming home safe. So
7 putting that aside, what would a good -- what would a
8 successful traffic stop for criminal interdiction look
9 like?

10 A. If some person breaking the law, doing some
11 kind of criminal activity, was put in jail.

12 Q. That's fair.

13 MS. HEBERT: I think that's all I have for
14 questions.

15 Charles, I'm going to call for production
16 of all the daily reports, worksheets, activity sheets
17 that Sergeant Gamboa talked about for the criminal
18 interdiction unit.

19 MR. FRIGERIO: Is that the same as the CAD
20 report?

21 THE WITNESS: No, that would -- that would
22 be that form that she showed.

23 MS. HEBERT: Not quite that form because
24 that was the one filled out by the sheriff.

25 THE WITNESS: Well, not that form, but

1 that -- that format.

2 MR. FRIGERIO: What's -- what's the actual
3 name?

4 THE WITNESS: Daily activity sheet.

5 MS. HEBERT: At this time, I'll pass the
6 witness. I will say that given that we still don't have
7 all the records, sorry, Sergeant Gamboa, I apologize,
8 you might have to come back and hang out with me again.
9 So we're going to leave this deposition open, should we
10 need to speak with you again.

11 THE WITNESS: Sure.

12 MR. ELLSWORTH: We'll reserve questions.

13 MR. FRIGERIO: Reserve our questions.

14 (Deposition concluded.)
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WITNESS NAME: PEDRO GAMBOA DATE: 08/01/2024

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This image shows a full page of blank handwriting practice paper. It features multiple sets of horizontal lines across the entire page. Each set consists of three lines: a solid top line, a dashed middle line, and a solid bottom line. These lines are evenly spaced and extend from the left edge to the right edge of the page, providing a guide for letter height and placement. There are no margins, text, or other markings on the paper.

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REPORTER'S CERTIFICATION
DEPOSITION OF PEDRO GAMBOA

TAKEN AUGUST 1, 2024

I, Janalyn Elkins, Certified Shorthand
Reporter in and for the State of Texas, hereby certify
to the following:

That the witness, PEDRO GAMBOA, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the original deposition was delivered to
CHRISTIE HEBERT;

That a copy of this certificate was served on
all parties and/or the witness shown herein on
_____.

I further certify that pursuant to FRCP No.
30(f)(i) that the signature of the deponent was
requested by the deponent or a party before the
completion of the deposition and that the signature is
to be returned within 30 days from date of receipt of
the transcript. If returned, the attached Changes and
Signature Page contains any changes and the reasons
therefor.

I further certify that I am neither counsel
for, related to, nor employed by any of the parties in
the action in which this proceeding was taken, and

1 further that I am not financially or otherwise
2 interested in the outcome of the action.

3 Certified to by me this 18th day of August
4 2024.

5 
6

JANALYN ELKINS

7 Texas CSR 3631

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1 Charles S. Frigerio, Esq.

2 Charlie@frigeriolawfirm.com

3 August 18, 2024

4 RE: Schott, Alek v. Babb, Joel Et Al

5 8/1/2024, Sergeant Pedro Gamboa (#6725911)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-midatlantic@veritext.com.

16 Return completed errata within 31 days from
17 receipt of testimony.

18 If the witness fails to do so within the time
19 allotted, the transcript may be used as if signed.

20
21
22 Yours,

23 Veritext Legal Solutions
24
25

[& - 18th]

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[abruptly - antonio]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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